

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 15-04

CROCUS INVESTMENTS, LLC AND CROCUS, FZE

(Complainants)

v.

**MARINE TRANSPORT LOGISTICS, INC. AND
ALEKSANDR SOLOVYEV a/k/a ROYAL FINANCE GROUP INC.**

(Respondents)

RESPONDENTS' APPENDIX

By: CICHANOWICZ, CALLAN, KEANE,
VENGROW & TEXTOR, LLP
Attorneys for Respondents
Marine Transport Logistics, Inc., and
Aleksandr Solovyev

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Respondents' Appendix

Documents

Maersk Line B/L No. 560010878 from NJ to Jebel AliRX 01
Maersk Line B/L No. 560083476 from NJ to Jebel AliRX 02
Marine Transport Logistics, Inc. B/L No. EO-20756 from NJ to Jebel AliRX 04
APL B/L No. APLU 020188407 from Jebel Ali to NJ.....RX 05

Deposition Transcripts

Transcript from the November 19, 2015 Deposition of Ms. Alla SolovyevaRX 06
Transcript from the November 20, 2015 Deposition of Mr. Aleksandr SolovyevRX 28
Transcript from the December 3, 2015 Deposition of Mr. Alexander SafanovRX 56

		NON-NEGOTIABLE WAYBILL		SOAC MAEU
Shipper MARINE TRANSPORT LOGISTICS INC 63 NEW HOOK ROAD BAYONNE NJ 07002 UNITED STATES		Booking No. 560010878		B/L No 560010878
Consignee MIDDLE EAST ASIA ALFA FZE JUMEIRAH VILLAGE CIRCLE, EMIRATES GARDEN HULBERRY-2, FLAT 119, DUBAI, UAE TEL: 97144340897		Export reference EO-20294		Inc Contract 644011
Trade Party SAME AS CONSIGNEE		<small>This contract is subject to the terms and conditions, including the law & jurisdiction clause and limitation of liability & declared value clauses, of the current Maersk Line Bill of Lading (available from the carrier's agents and at www.maerskline.com), which are applicable with logical amendments (mutatis mutandis). To the extent necessary to deviate the Consignee to use and to be sued under this contract, the Shipper on entering into this contract does so on his own behalf and as agent for and in behalf of the Consignee and warrants the heretofore authority to do so. The shipper shall be entitled to change the Consignee at any time before delivery of the goods provided he gives the Carrier reasonable notice in writing. Delivery will be made to the Consignee or his authorized agent on production of reasonable proof of identity (and, in the case of an agent, reasonable proof of authority) without production of this waybill. The Carrier shall be under no liability whatsoever for misdelivery unless caused by the Carrier's negligence.</small>		
Vessel MAERSK WYOMING		Voyage No. 1307		<small>Onward transit routing (not part of Carriage) is subject to clause 1, for account and risk of Merchant</small>
Port of Loading Newark		Port of Discharge JEBEL ALI, UNITED ARAB EMIRATES		<small>Ports of Receipt, Applicable only when document used as received Waybill</small> <small>Ports of Delivery, Applicable only when document used as returned Transport S/L (see clause 1)</small>

PARTICULARS FURNISHED BY SHIPPER

<small>END of Package; Description of goods; Marks and Numbers; Container No./Seal No.</small>		Weight 5329.71 KGS	Measurement
1 Container Said to Contain 2 Vehicles 2011 MONTEREY VIN# RGFMC1931011 2002 CHAPARRAL VIN# FGB31748G102 X20130502013089 MSKU4805390 45 DRY 9'6" 2 Vehicles 5329.71 KGS Shipper Seal : 268274 THESE COMMODITIES, TECHNOLOGY, OR SOFTWARE WERE EXPORTED FROM THE UNITED STATES IN ACCORDANCE WITH THE EXPORT ADMINISTRATION REGULATIONS. DIVERSION CONTRARY TO U.S. LAW PROHIBITED. SHIPPER'S LOAD, STOW, WEIGHT AND COUNT FREIGHT PREPAID CY/CY			
<small>Shipper's particulars are declared by Shipper, but without responsibility of or representations by Carrier.</small>			

Freight & Charges	Rate	Unit	Currency	Prepaid	Collect
<small>Carrier's Receipt. Total number of containers or packages received by Carrier</small> 1 container	<small>Place of Issue of Waybill</small> Charlotte	<small>Shipped, as far as is ascertainable by reasonable means of checking, in apparent good order and condition unless otherwise stated hereon the total number or quantity of Containers or other packing is or units indicated in the box opposite entitled "Carrier's Receipt"</small>			
<small>or date on which Date (Local Time)</small> 2013-05-05	<small>Date Issue of Waybill</small> 2013-05-28				
<small>Optional Value Charges (see Clause 2, 1) of the Transport Law 65 of (Country) for Declared Value of US\$</small>					
<small>Shipper</small> MARINE TRANSPORT LOGISTICS HOOK RD Bayonne NJ 07002			Signed for by Carrier A.P. Pasha - Maersk AIS trading as Morris Line  Maersk Agency U.S.A., Inc - Charlotte CRC <small>is Agent for the Carrier</small>		

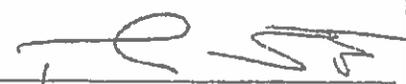
RESP 001

RX 01

 MAERSK LINE		NON-NEGOTIABLE WAYBILL		SOC MAEU AL No. 550083476
Shipper MARINE TRANSPORT LOGISTICS INC 63 NEW HOOK ROAD BAYONNE NJ 07002 UNITED STATES*		Booking No. 560083476		
Consignee MIDDLE EAST ASIA ALFA FZE JUMEIRAH VILLAGE CIRCLE, EMIRATES GARDEN MULBERRY-2, FLAT 119, DUBAI, UAE TEL. 97144340897		Export Reference EO-20755	Est. Contact 644011	
Notify Party SAME AS CONSIGNEE		<small>This contract is subject to the terms and conditions, including the law & jurisdiction clause and limitation of liability & declared value clauses, of the current Maersk Line Bill of Lading (available from the carrier, its agents and at www.maerskline.com), which are applicable with local amendments (where applicable). To the extent necessary to enable the Consignee to sue and to be sued under this contract, the Shipper on entering into the contract does so on his own behalf and as agent for and on behalf of the Consignee and warrants that he has the authority to do so. The shipper shall be entitled to change the Consignee at any time before delivery of the goods provided he gives the Carrier reasonable notice in writing. Delivery will be made to the Consignee or his authorized agent on production of reasonable proof of identity (and, in the case of an agent, reasonable proof of authority) without production of this waybill. The Carrier shall be under no liability whatsoever for redelivery unless caused by the Carrier's negligence.</small>		
Vessel SEA LAND MERCURY		Place of Receipt, Applicable only when document used as Multimodal transport		
Port of Loading Newark		Place of Delivery, Applicable only when document used as Multimodal transport (see Clause 1)		

PARTICULARS FURNISHED BY SHIPPER

One of Packages, Description of goods, Marks and Number, and other particulars 1 Container Said to Contain 2 Units 2 Vehicles 2008 CHAP BOAT VIN# FGRL3738D808 2007 FOUR WINNS VIN# GFNMW113E707 *Oksana Khanzhina Telephone: (201) 858-8600 Telefax: 201.858.8607 Email: documentation@mtiworld.com X20130515016501 PONU3045771 45 DRY 9'6 2 Units 4535.92 KGS Shipper Seal : 7268064 THESE COMMODITIES, TECHNOLOGY, OR SOFTWARE WERE EXPORTED FROM THE UNITED STATES	Weight 4535.92 KGS	Measurement
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Carrier's Receipt, Total number of Containers or packages received by Carrier 1 container	Place of Issue of Receipt Charlotte	Stamped, as far as is practicable, by reasonable means of checking, in apparent good order and condition unless otherwise stated herein the total number or quantity of Containers or other packages or units indicated in the box opposite entitled "Carrier's Receipt"
Issued on Board B/L or (Local First) 2013-05-25	Date Issue of Receipt 2013-06-11	
Declared Value Charge (see clause 7.3 of the Maersk Line B/L of Lading) for District Value of US\$		
Signature MARINE TRANSPORT LOGISTICS HOOK RD Bayonne NJ 07002		Signed for the Carrier AJ, Fuller - Maersk A/S trading as Maersk Line  Maersk Agency U.S.A., Inc - Charlotte CRC <small>As Agent(s) for the Carrier</small>

This transport document has one or more numbered pages

STATES IN ACCORDANCE WITH THE EXPORT ADMINISTRATION REGULATIONS.
DIVERSION CONTRARY TO U.S.LAW PROHIBITED.
SHIPPER'S LOAD, STOW, WEIGHT AND COUNT
FREIGHT PREPAID
CY/CY

Freight & Charges	Rate	Unit	Currency	Prepaid	Collect

BILL OF LADING

2. EXPORTER <i>(Principal or other licensee and address including ZIP Code)</i> Marine Transport Logistic Inc 63 NEW HOOK RD, Tel: 2018588600, BAYONNE, NJ 07002, USA <div style="text-align: right; margin-top: 10px;">ZIP CODE</div>		5. DOCUMENT NUMBER 560083476	3a. BL NUMBER EO-20756	
3. CONSIGNEE TO Middle East Asia Alfa FZE Jumeirah Village Circle, Emirates Garden 2 Mulberry-2, flat 119, Tel: 971 4 434 0897, DUBAI, UNITED ARAB EMIRATES		7. FORWARDING AGENT <i>(Name and address - reference)</i> Marine Transport Logistic Inc 63 NEW HOOK RD, BAYONNE, NJ 07002, USA		
4. NOTIFY PARTY/INTERMEDIATE CONSIGNEE <i>(Name and address)</i>		9. DOMESTIC ROUTING/EXPORT INSTRUCTIONS <div style="font-size: 1.2em; font-family: cursive;">Letter: 88498991</div>		
12. PRE-CARRIAGE BY	13. PLACE OF RECEIPT BY PRE CARRIER	8. PORT (STATE) OF ORIGIN OR FTZ NUMBER		
14. EXPORTING CARRIER SEA LAND MERCURY / 1311	13. PORT OF LOADING/EXPORT Newark	10. LOADING PIER/TERRAINAL		
16. FORWARD PORT OF UNLOADING <i>(Vessel and berth only)</i> Jebel Ali	17. PLACE OF DELIVERY BY ON-CARRIER	11. TYPE OF MOVE Vessel, Containerized	11a. CONTAINERIZED <i>(Vessel only)</i> Yes <input checked="" type="checkbox"/> No	
MARKS AND NUMBERS (18)	NUMBER OF PACKAGES (19)	DESCRIPTION OF COMMODITIES <i>in Schedule B code</i> (20)	GROSS WEIGHT <i>gross</i> (21)	MEASUREMENT (22)
PONU3045771 7268064 WR 83794 WR 84551	1 PCS 1 PCS	45 Ft. High Cube auto 2007 Four Winns VIN:GFNMN113E707 2008 CHAP BOAT VIN:FGRL3738D808 AES XTN: 123456789-HBOL13826	2948.35 Kg 1587.57 Kg	
2		4535.92 Kg		0.00 ft ³

DECLARED VALUE US\$ _____ SUBJECT TO EXTRA FREIGHT AS PER TARIFF AND CLAUSE 7 (a) OF THIS BL.

FREIGHT RATES, CHARGES, WEIGHTS AND/OR MEASUREMENTS		
SUBJECT TO CORRECTION	PREPAID	COLLECT
GRAND TOTAL		

RECEIVED by the Carrier from the Merchant in apparent conformity with order and condition unless otherwise indicated herein, the Goods or the Containers or other packages or contents by the Merchant to contain the same herein mentioned, for Carriage or the transportation of Carriage, subject to the terms and conditions provided for on the Bill of Lading and in the Carrier's tariff rules and regulations, by the Ship named herein and/or other means of transport from the place of receipt at the port of loading to the place of delivery or port of discharge shown herein and there to be delivered as indicated by law or contract. The Carrier has received three (3) original Bills of Lading, one of which being acknowledged, the others to stand void. It is required by the Carrier, that Bill of Lading signed or duly endorsed must be surrendered in exchange for the Goods or delivery order. In receiving this Bill of Lading, the Merchant agrees to be bound by all the terms and conditions hereof and by the Carrier's tariff which is incorporated herein, all of which include any of other agreements, including booking notes, any local custom or practice to the contrary notwithstanding. The terms of this Bill of Lading shall be separate and if any part or parts thereof is invalid or unenforceable, the validity and enforceability of any other part or parts shall not be affected. An endorsement on this Bill of Lading to the effect that the Goods are "in transit" shall ensure that the Goods are loaded on board the Ship named in this Bill of Lading, or loaded on land rail cart, truck, or other means of conveyance and are in the custody of an Landring Carrier or Through Carrier in accordance with the terms and conditions of this Bill of Lading.

DATED AT Bayonne

By Marine Transport Logistic Inc
SIGNED ON BEHALF OF THE CARRIER

05/22/2013
 Month / Day / Year

BL No. EO-20756

BILL OF LADING

SENDER (Principal or Seller Name and Full Address) MIDDLE EAST ASIA ALFA FZE HARJAH, UAE P.O. BOX : 51352 TEL : 0971 4 4340897 MOB : 0971 56 1440911		BOOKING NUMBER 020188407	BL NUMBER/PAGE 1 OF 1 APLU 020188407
ADDRESSEE (Name and Full Address / Non-Negotiable Unless Consigned to Order) (Unless provided otherwise, a consignment "To Order" means To Order of Shipper.) MARINE TRANSPORT LOGISTIC LEW HOOK ROAD 63 MAYONEE, NJ07002 TEL : 201 858 8600 FAX : 201 858 8607		EXPORT REFERENCES DEC # 2010183656214	
FORWARDING AGENT (Reference, F.M.C. No.) AEC CARGO SERVICES LLC 206, MOHD AL TAYAR BLDG AL MINA ROAD, BUR DUBAI		PORT AND COUNTRY OF ORIGIN OF GOODS UNITED STATES	
ALSO NOTIFY (Name and Full Address) / DOMESTIC ROUTING / EXPORT INSTRUCTIONS / PIER - TERMINAL / ONWARD ROUTING FROM PORT OF DESTINATION			
NAME OF CONSIGNEE MAHER TERMINAL, NJ			
TOTAL CARRIAGE (MODE)	PLACE RECEIVED JEBEL ALI, DUBAI		
IFL CARRIER (Mode) & Seal 009	PORT OF ORIGIN JEBEL ALI, DUBAI		
MAHER TERMINAL, NJ	MAHER TERMINAL,		

Trade Valuations Please refer to Clause 7 (D) on Reverse Side PARTICULARS FURNISHED BY SHIPPER Payment by Cheque must be made to the order of APL Co. Pte Ltd

MARKS & NOS / CONTAINER NOS.	NO OF PKGS	DESCRIPTION OF MERCHANDISE AND GOODS	GROSS WEIGHT	MEASUREMENT
SC CTRF001/E	2	1 X 40' HC CONTAINER UNIT AA) LV73500.09.00 SLAC CY/CY 2008 CHAPARRAL BOAT VIN NO FGBL3738D808 2011 MONTEREY BOAT VIN NO RGFMC1931011 FREIGHT PREPAID	5500.000KG 2125.410LB	40.000M3 1412.588CB
CTR NBR** **SEAL NBR**** T/S HT MODE QUANT/TYPER WEIGHT *RLU664213-4 AM30032658 D40 96 CY/ CY 2UNIT 5500.00KG ** SHIPPER'S LOAD, STOW AND COUNT **				
DBA		DUBAI, UAE		
** FREIGHT PREPAID ** ***** APL COPY ***** ** NON-NEGOTIABLE * SHIPPED ON BOARD MAY. 30, 2014 ***** APL COPY ***** ** NON-NEGOTIABLE *				

TO BE RELEASED AT		OCEAN FREIGHT PAYABLE AT		Local Currency	
CF	FREIGHT RATE	SEAL WEIGHT	NOB/VAN	FR	COLLECT US \$
SE	US\$	7/VAN		380.00	
HC	US\$	371/VAN		7.00	
SC	US\$	12/VAN		371.00	12.00
SO	US\$	12/VAN		12.00	
RS	US\$	90/VAN		90.00	
MS	US\$	10/EA		10.00	
OC	DIRH	380/EA		103.46	380.00
CV 009		DBA		3593.46	380.00
TOTAL FREIGHT		F96		12.00	
Actual	00899185	00899195	00709018	JEB	F96 - F96

The undersigned hereby certifies that the contents and weight of the goods are as stated in this bill of lading and that the goods are in conformity with the mate receipts and tally sheets. The undersigned also certifies that the goods are in conformity with the mate receipts and tally sheets and that the goods are in conformity with the mate receipts and tally sheets.

By: **MAY 30, 2014**
 DUBAI, UAE
 APLU 020188407

FCC	FORWARDER	SHIPPER	CONSIGNEE	LD PORT	DLG PORT	DEST	NOTIFY	CSC	BL NUMBER
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RESP 006

RX 05

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FEDERAL MARITIME COMMISSION

-----X

CROCUS INVESTMENTS LLC and CROCUS FZE,

Complainants,

Docket No.

-against- 15-04

MARINE TRANSPORT LOGISTICS, INC. and

ALEKSANDR SOLOVYEV a/k/a ROYAL

FINANCE GROUP, INC.

Respondents.

-----X

November 19, 2015

10:53 a.m.

Deposition of ALLA SOLOVYEVA, taken by

Complainants via video conference at the

offices of Esquire Deposition Solutions, 1384

Broadway, New York, New York, before Anneliese

R. Tursi, a Registered Professional Reporter

and Notary Public within and for the State of

New York.

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S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED

by and between the attorneys for the

respective parties herein that filing

and sealing be and the same are hereby

waived.

IT IS FURTHER STIPULATED AND

AGREED that all objections, except as to

the form of the question, shall be

reserved to the time of the trial.

IT IS FURTHER STIPULATED AND

AGREED that the within deposition may be

signed and sworn to before any officer

authorized to administer an oath with

the same force and effect as if signed

and sworn to before the Court.

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A P P E A R A N C E S

THE LAW OFFICE OF LOUIZA TARASSOVA, P.A.

Attorneys for Complainants

1420 Lake Baldwin Lane Unit A

Orlando, Florida 32814

BY: LOUIZA TARASSOVA, ESQ.

407-622-1885

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(Present via video conference.)

CICHANOWICZ, CALLAN, KEANE, VENGROW &

TEXTOR, LLP

Attorneys for Respondents

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Suite 3000

New York, New York 10006-2802

BY: STEPHEN H. VENGROW, ESQ.

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1 A. SOLOVYEVA

2 ALLA SOLOVYEVA,

3 residing at 420 Jansen Street, Staten

4 Island, New York 10312, having been

5 first duly sworn/affirmed by the Notary

6 Public (Anneliese R. Tursi), was

7 examined and testified as follows:

8 EXAMINATION BY MS. TARASSOVA:

9 Q. Good morning, Ms. Solovyeva.

10 A. Hello.

11 Q. Were you in the room earlier when

12 I was going over the ground rules for the

13 deposition?

14 A. Well, I didn't listen to your

15 questions, whatever you said.

16 Q. Okay. I will begin from the

17 beginning.

18 Have you ever been to a deposition

19 before?

20 A. Yes.

21 Q. How many times?

22 A. I cannot recall that.

23 I'm the owner of the company.

24 MR. VENGROW: Talk to her. Don't

25 talk to me.



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1 A. SOLOVYEVA
2 A. Sometimes I have this.
3 Q. So how many times -- is it between
4 one and five or five and ten or ten and 15?
5 A. I cannot say that. I don't
6 remember.
7 Maybe a couple of times.
8 Q. Maybe how many?
9 A. Maybe a couple of times.
10 Q. I want to go over the ground rules
11 for the deposition. Basically, I'm sure you
12 have heard it before, but I just want to
13 refresh your memory again.
14 I'm going to assume that you
15 understood my questions, unless you ask me to
16 rephrase the question or restate the question.
17 Okay?
18 A. Okay.
19 Q. So if you don't understand what
20 I'm asking, please stop me and ask me to
21 restate it, rephrase it, so that you can
22 understand it. Okay?
23 A. Okay.
24 Q. I am going to need a verbal
25 response from you. Sometimes we tend to

Page 6

1 A. SOLOVYEVA
2 naturally nod or shake our heads instead of
3 saying yes or no. If you can just give me a
4 verbal response -- yes, no, maybe -- so that
5 way the court reporter can put it down on the
6 record properly. Okay?
7 A. Okay.
8 Q. So throughout the deposition your
9 attorney or I may be making objections. Don't
10 let that throw you off. Stop answering the
11 question, wait for us to resolve the issue and
12 then continue to answer when you have an
13 instruction. Okay?
14 A. Okay.
15 Q. Are you on any kind of medication
16 today that might prevent you from remembering
17 certain facts?
18 A. No.
19 Q. Are you suffering from any kind of
20 an illness that may prevent you from being
21 able to attend this deposition and answer the
22 questions?
23 A. No.
24 Q. What is your address?
25 A. It's 420 Jansen Street, Staten

Page 7

1 A. SOLOVYEVA
2 Island, 10312.
3 Q. And who lives there with you?
4 A. My daughter.
5 Q. And what is her name?
6 A. Danielle Solovyeva.
7 Q. Are you married?
8 A. I don't have to answer this
9 question.
10 Q. I'm going do ask you to answer the
11 question. That is the point of the
12 deposition. I get to ask you questions --
13 A. I think it is a personal question.
14 MR. VENGROW: Can I speak to her a
15 second. You have to answer the
16 question.
17 (Discussion off the record.)
18 A. I'm not divorced, but I'm living
19 apart with my husband.
20 Q. Are you currently separated?
21 A. Well, we're living apart.
22 Q. And what is your husband's name?
23 A. Aleksandr Solovyeva.
24 Q. Does Mr. Solovyeva ever live at
25 that address that you say you live at now?

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1 A. SOLOVYEVA
2 A. Yes.
3 Q. And when did he move out?
4 A. I cannot recall that.
5 Q. Was it this year?
6 A. No.
7 Q. Was it last year?
8 A. I cannot recall that, ma'am. I
9 don't want to lie to you. This year, last
10 year or five years ago.
11 Q. I'm asking you generally to answer
12 the question. I'm certainly not going to hold
13 you to the wrong date. I just want --
14 A. I understand, ma'am. This is what
15 I'm saying to you. I cannot recall that. It
16 wasn't this year and it wasn't last year.
17 Q. So was it two years ago?
18 A. I cannot recall that, ma'am.
19 Q. Other than your daughter, does
20 anyone else live at your address?
21 A. I have a dog.
22 Q. Any human beings?
23 A. It's a human.
24 MR. VENGROW: Alla --
25 THE WITNESS: That's fine.



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1 A. SOLOVYEVA
2 Q. I agree with you. I have a dog as
3 well. They are like people.
4 Can you please tell me what your
5 phone number is that you use.
6 A. 718-612-2119.
7 Q. And is that a mobile?
8 A. Yes.
9 Q. And an e-mail address, all e-mail
10 addresses that you use.
11 A. It is Alla, A-L-L-A, at
12 MTLWorld.com.
13 Q. Is that the only address that you
14 use?
15 A. Yes.
16 Q. Are you currently employed?
17 A. Yes. I'm the owner.
18 Q. Of Marine Transport Logistics?
19 A. Exactly.
20 Q. Are you employed by anyone else?
21 A. No.
22 Q. Before you owned Marine Transport
23 Logistics -- first of all, let me go back.
24 When was Marine Transport
25 Logistics opened?

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1 A. SOLOVYEVA
2 A. I believe in 2001.
3 Q. Before you opened Marine Transport
4 Logistics, were you employed?
5 A. Yes. I had the same company
6 located in Brooklyn, New York, but the name of
7 the company was a little bit different.
8 Q. And what was the name at the time?
9 A. I believe it was MTL Worldwide, or
10 it was MTL Marine Transport Logistics,
11 something like that.
12 I think it was MTL Marine
13 Transport Logistics.
14 Q. And what state was that company
15 registered in?
16 A. New York.
17 Q. Other than being the owner of
18 Marine Transport Logistics, do you hold any
19 other role with the company?
20 A. Such as?
21 Q. The president, the vice
22 president --
23 A. I hold all roles in my company.
24 Q. I'm sorry, what?
25 A. I'm holding all roles in my

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1 A. SOLOVYEVA
2 company. I am the only one, decisionmaker,
3 and I have a hundred percent of all stocks in
4 the company.
5 Q. So can you describe to me your
6 daily duties. What do you do on a daily basis
7 for the company?
8 A. Okay. Basically, I am handling
9 all service contracts with the ocean carriers,
10 and I am reviewing the inventory and I am
11 asking my employees how much inventory we have
12 and what is the plan for the shipping and the
13 loading, and if they have any problems.
14 Then I open my e-mail box and I
15 read through. I answer all e-mails.
16 And sometimes I'm running meetings
17 with the different departments.
18 Then I'm asking my accountant if
19 everything is okay with the accounts and if
20 any checks were bounced.
21 So this is the daily routine.
22 Q. And would you say you are there
23 pretty much every day at the office?
24 A. Yes. I am every day in the
25 office, yes.

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1 A. SOLOVYEVA
2 Q. What is the physical address for
3 MTL?
4 A. It is 63 New Hook Road, Bayonne,
5 New Jersey, 07002.
6 Q. Are any other businesses located
7 at that address? Does MTL allow any other
8 businesses to use that address?
9 A. MTL is a tenant. I'm not the
10 landlord. So the building has plenty of
11 different companies and a law office, and my
12 competition as well.
13 Listen, it is a lot of companies.
14 Trading companies.
15 Q. Who is your landlord?
16 A. He is -- it is Jerham Realty.
17 Q. How do you spell that?
18 A. It is hard to say. I don't
19 remember the exact spelling. I believe it is
20 J-E-R-H-A-M. Jerham Realty.
21 Q. Who is the person that you deal
22 directly with?
23 A. A Lenny.
24 Q. How do you spell that?
25 A. L-E-N-N-Y.

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1 A. SOLOVYEVA
2 Q. Lenny?
3 A. Yes.
4 Q. Is that a male or female?
5 A. It's a male.
6 Q. Does he have a last name?
7 A. I don't remember his last name.
8 Q. How long has MTL been renting from
9 Jerham Realty at 63 New Hook Road?
10 A. Approximately eight years.
11 Q. And do you have a lease?
12 A. Yes.
13 Q. And how long is that lease for?
14 A. It's -- we reviewing lease every
15 five years.
16 Q. When is it expiring next time?
17 A. I believe in two years.
18 Q. When does it expire next time,
19 when is the renewal coming up?
20 A. I just told you. In two years.
21 Q. In two years. I'm sorry. This
22 audio is bad.
23 A. That's okay.
24 Q. So in 2017 you are due to renew?
25 A. '17 or '18.

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1 A. SOLOVYEVA
2 Q. Does the company have a website?
3 A. Yes.
4 Q. What is the website domain?
5 A. It's MTLWorld.com.
6 Q. Does that have a Facebook page?
7 A. Yes.
8 Q. Does that have a LinkedIn page?
9 A. Yes.
10 Q. And who is responsible for
11 updating the contents on the website, LinkedIn
12 and Facebook?
13 A. I have an IT engineer.
14 Q. And do you sign all the documents
15 on behalf of the company?
16 A. If it is required.
17 Q. Does anyone else have any power to
18 sign any documents on behalf of the company?
19 A. No.
20 Q. Does your husband work for MTL?
21 A. He's not working for MTL. He's
22 working for his own companies.
23 Q. And what are --
24 A. It's just like business
25 relationship.

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1 A. SOLOVYEVA
2 Q. What companies does he own?
3 A. Well, you have to ask him this
4 question. I know of just a couple of
5 companies. I know Royal Finance and World
6 Express and Connection.
7 Q. And what is the relationship
8 between MTL and his companies?
9 A. Well, since his companies handling
10 all loading process and storing of the cargo
11 of MTL.
12 But not just MTL. We are one of
13 his customers. Let's put it this way.
14 So I am requesting, not me, but my
15 staff when it is needed, we are requesting
16 loading from him, and this is his job.
17 Q. Is his company, World Express and
18 Connection, is that also located at 63 New
19 Hook Road in New Jersey?
20 A. Which one?
21 Q. The World Express and --
22 A. No, it's not. No, it's not.
23 It has a different address.
24 Q. Do you know the address?
25 A. 70 Lefante Drive, Bayonne, New

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1 A. SOLOVYEVA
2 Jersey, 07002.
3 Q. That's down the street from the 63
4 New Hook Road?
5 A. Yes.
6 Q. Did he recently move the company
7 there?
8 A. No. He was there from the day
9 one.
10 Q. Does MTL participate in providing
11 goods for clients, do they go out to the
12 auction and purchase vehicles or vessels?
13 A. Ma'am, you have to rephrase it. I
14 don't understand.
15 Q. Does your company, MTL, does it
16 participate in obtaining goods for your
17 clients? Such as, going to an auction and
18 buying vehicles or vessels.
19 A. Vessels?
20 Q. Yes.
21 A. We are not buying vessels. What
22 vessels?
23 Q. Does MTL buy any goods for your
24 clients?
25 A. No, we never go physically and we

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1 A. SOLOVYEVA
2 never buy anything from auctions.
3 But what we can do, if the
4 customer is asking us to pay for some
5 purchases they did, and that they will pay us
6 back, we might do that. We might support the
7 customers.
8 Q. Can you give me more detail about
9 how you would do that.
10 A. Well, some of the customers, for
11 example, if they have problems with the money,
12 it is stuck somewhere, or it will take like a
13 couple of days and they need to pay to the
14 auto auction for purchase of the vehicle, so I
15 might chip in.
16 But usually this is not the case.
17 I don't like to do that.
18 Q. Do you mean you lend money to
19 clients?
20 A. I don't lend money. It is not
21 lending.
22 It is just, I am paying for the
23 purchase so he is not going to get stuck with
24 the penalty charges.
25 Then, like, in a couple of days he

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1 A. SOLOVYEVA
2 pays me back. But it is a very rare
3 situation.
4 Q. Who signs checks on behalf of
5 Marine Transport Logistics?
6 A. Only me.
7 Q. Has your husband ever signed
8 checks on behalf of Marine Transport
9 Logistics?
10 A. He has no access to my checkbook,
11 and all my checks are getting printed. We
12 have printed forms. So it's impossible.
13 Q. Has your husband ever been a
14 representative or an agent on behalf of Marine
15 Transport Logistics?
16 A. Yes.
17 Q. In what capacity? Can you explain
18 that.
19 A. Well, see that I have a different
20 sources of how to sell my company services,
21 and how to produce the income, and you see
22 that any person can act on behalf of my
23 company as a broker.
24 For example, if you have a friend
25 and your friend is asking you, your friend is

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1 A. SOLOVYEVA
2 located overseas asking you to export a
3 container or some goods out of United States
4 or to overseas, then you are acting as the
5 agent for your customer, for your friend, and
6 for me.
7 So you are calling to me and you
8 are saying, you know what, I need to send
9 these goods outside. Can you please help me
10 out. I will give you the business.
11 Or, you know, it could be just not
12 on one occasion. It could be on many
13 different occasions.
14 So I do have these kind of people
15 who support my company with the business.
16 Q. And can you talk to me about how
17 your husband has done that in the past with
18 the company, how he has been an agent.
19 A. Well, it is very simple. You see
20 that he is selling his company services. It
21 is loading and storing and building something
22 on his lot, but very often the customer is
23 asking for the full services, not just the
24 loading, but the ocean freight as well. So
25 Alex sometimes he is asking me for the rate,

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1 A. SOLOVYEVA
2 how much it might cost, and then he is asking
3 not just me. He might ask somebody else, also
4 as well. I'm not the only choice he has and
5 he is working with.
6 So then, you know, it is like a
7 mutual benefit. He is loading. He has a job
8 for the loading and supporting his people, and
9 I have a job for my people in the office.
10 Q. How many employees does MTL have?
11 A. In all, it is, besides me, it is
12 12.
13 Q. And those are all office
14 employees?
15 A. Yes. But see, the employees, it
16 means that the people are getting W-2. Not
17 all my employees are on W-2. Some.
18 Q. You have contractors?
19 A. Yeah. I have -- yes, I have two
20 consultants and it is salespeople, and then I
21 have one consultant who is working in office
22 and, like, doing meetings, and, you know, more
23 like in HR.
24 And then I have documentation
25 department. And I have ro-ro department. R-O

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1 A. SOLOVYEVA
2 R-O. I have ro-ro department. It is
3 everything what is not containerized.
4 And I have loading department, and
5 domestic inland transportation.
6 Q. Have you ever heard of Alexander
7 Safonov?
8 A. Excuse me?
9 Q. Have you ever heard of Alexander
10 Safonov?
11 A. I have no idea who this person is.
12 Q. What do you know about the
13 transactions that are at issue in this case?
14 A. I don't know what the case is
15 about.
16 Q. What do you mean you don't know
17 what the case is about?
18 A. Well, you see, I have, I'm moving
19 approximately 10,000 containers per year, and,
20 you know, I cannot physically put my nose in
21 each shipment.
22 So I would like you to be a little
23 bit more specific.
24 Q. Well, you have, your company has
25 been sued in the Federal Maritime Commission.

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1 A. SOLOVYEVA
2 Do you know that?
3 A. Yes, I know that.
4 Q. And the complaint, the complainant
5 filed a complaint, a formal complaint where
6 they describe what the lawsuit is about. Do
7 you know that?
8 A. Um-hmm. Yes, I know.
9 Q. And there has been some discovery
10 served, there are documents that have been
11 served to your attorney that further describe
12 what the case is about.
13 Have you seen those?
14 A. Hold on a second.
15 (Witness/attorney colloquy.)
16 A. You see, I saw some documents.
17 I'm not the lawyer. I'm not professional.
18 The documents what you exchanged on 26.
19 MR. VENGROW: Excuse me. She
20 means Rule 26, not the 26th as a
21 calendar day.
22 A. I saw some documents and I read
23 them, but, you know, I'm not professional. I
24 don't understand. I understand only in
25 shipping.

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1 A. SOLOVYEVA
2 Q. I'm not talking about legal
3 documents. I'm talking about e-mails between
4 your husband, as agent for MTL, and the
5 complainant, the Crocuses, Crocus in Dubai and
6 the Crocus in Florida.
7 A. No, ma'am. I never saw this
8 document, and I never was involved in any
9 e-mails. I never was copied. And so I have
10 no idea what this is all about.
11 Q. Did you receive a notice of
12 deposition that described the scope of today's
13 deposition?
14 A. Yes, but, you see, that the name
15 of the company Crocus is not familiar to me.
16 MR. VENGROW: Just answer the
17 question. Okay. She just asked you if
18 you received this. That's all.
19 Q. But did you see the notice of
20 deposition that was served on your company
21 Marine Transport Logistics that --
22 A. Yes.
23 Q. -- asks the person that will be
24 testifying today to be apprised of the
25 information within the notice?

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1 A. SOLOVYEVA
2 A. Yes, but if I don't have the
3 information....
4 Q. So what you are saying is you
5 don't have any information.
6 Did you go back and try to look
7 for documents that relate to --
8 A. Ma'am, I just stated to you that I
9 was not copied in e-mails between Alex and
10 Crocus, and this company never was my
11 customer. So I cannot be involved or familiar
12 with the company which never was a customer of
13 my company.
14 Q. Who was the customer of your
15 company in that transaction?
16 A. The customer was Andrey Tretyikov.
17 Q. He was MTL's customer?
18 A. Well, in some occasions he was.
19 But what I know, that in some occasions he was
20 a customer of Royal Finance.
21 Q. Who was the -- the question I
22 asked, who was MTL's customer in this
23 transaction? Who did MTL serve?
24 A. In this transaction, you mean
25 these transactions for these two boats?

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1 A. SOLOVYEVA
2 Q. The three boats, the Monterey, the
3 Chaparral and the Formula.
4 A. I think only two boats were
5 exported.
6 Q. I'm referencing our complaint
7 where we describe the things that we describe.
8 I'm talking about everything today. So you
9 tell me.
10 Who was the customer, who did MTL
11 deal with in this transaction in relation to
12 the complaint?
13 MR. VENGROW: Counsel, don't you
14 have copies of these in your own files?
15 We sent them to you. You can ask
16 questions based on what you have. This
17 deposition will go quicker, because I'm
18 not sure I understand your questions.
19 THE WITNESS: Me too.
20 Q. You are saying that you don't know
21 anything about this lawsuit. Right? That's
22 my understanding that's what you said.
23 MR. VENGROW: No, you are
24 misrepresenting what she is saying.
25 You produced a topical list. She

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1 A. SOLOVYEVA
2 can talk to that. Why don't you ask her
3 questions on those. Maybe that will
4 help you to go forward.
5 MS. TARASSOVA: Right. Can we go
6 off the record for a second.
7 MR. VENGROW: Sure.
8 (Discussion off the record.)
9 MR. VENGROW: Go on the record.
10 Say what you want -- we were off the
11 record.
12 We are off the record right now.
13 (Discussion off the record.)
14 MR. VENGROW: Back on the record.
15 I'm going to ask this one question
16 of my client.
17 MS. TARASSOVA: Okay.
18 MR. VENGROW: Did you state that
19 you don't know anything about this case?
20 THE WITNESS: No, I did not.
21 MR. VENGROW: Can you --
22 THE WITNESS: What I think
23 occurred: She asked me if I saw any
24 documents. And I asked her what
25 documents.

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1 A. SOLOVYEVA
2 The documents, what I can see
3 only, it's a bill of ladings and it's
4 invoices.
5 What other documents I should see?
6 Then she ask me that if I saw the
7 e-mails, exchanging e-mails between
8 Aleksandr Solovyev and company Crocus.
9 I never saw these e-mails. I was
10 not involved or copied in these e-mails.
11 So then she suggested that I don't
12 know nothing.
13 BY MS. TARASSOVA:
14 Q. Ma'am, let me clarify this for you
15 because I think you are confused. Let me
16 explain to you.
17 In this case there have been
18 documents, these e-mails that I'm talking
19 about, my client produced them to your
20 attorney. Your attorney is supposed to show
21 you these documents as part of the case.
22 These are not legal documents and it is okay
23 if you were not cc'd on them. They have been
24 disclosed to you at this time.
25 I'm asking: Have you seen the

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1 A. SOLOVYEVA
2 e-mails between your husband and Mr. Safonov
3 in this case? Have you seen a copy of those
4 e-mails yet? Has your attorney showed them to
5 you?
6 MR. VENGROW: I didn't show them
7 to you.
8 A. No, I didn't see them.
9 MR. VENGROW: There is another
10 defendant in this case. You realize
11 that?
12 MS. TARASSOVA: I'm sorry?
13 MR. VENGROW: There is another
14 respondent in this case, which is Alex
15 and this a/k/a.
16 MS. TARASSOVA: I'm just asking
17 her a question. That's all.
18 A. Ma'am, I didn't see those e-mails
19 because those e-mails are not my concern. It
20 is e-mails between Aleksandr Solovyeva and
21 Crocus, and Crocus is not my customer.
22 So Alex is sending on a daily
23 basis, I don't know how many thousands of the
24 e-mails, and I don't understand why I should
25 be involved or read them. It's not -- it's

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1 A. SOLOVYEVA
2 not my business.
3 Q. How was MTL involved in this case?
4 A. MTL provided Andrey Tretyikov with
5 the transportation and with the loading of his
6 boats.
7 So when my company, we have
8 specific department who receives the e-mails,
9 if the customer wants to ship something out.
10 So then after this request, we
11 start work on the process, then we are doing
12 the loadings, then we are producing bill of
13 loadings, then the invoices, and send it over
14 to the customer. This is basically what my
15 company is doing.
16 Q. And when you talk about the
17 specific departments, what is the name of the
18 department that deals with that?
19 A. Loading department.
20 Q. Who works in the loading
21 department?
22 A. At that time when this occurred it
23 was Irina Polkovnik, but she is not with the
24 company any more.
25 Q. And other than Irina Polkovnik,

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1 A. SOLOVYEVA
2 did anyone else deal directly with this
3 transaction?
4 A. I don't think so because she was
5 involved in loading, unless if she was sick.
6 Q. And who made the request? Who did
7 the request come from?
8 A. Ma'am, I cannot say that because
9 we have this request, thousands of requests on
10 a daily basis.
11 This is what my employees, their
12 duties, they are receiving e-mails and they
13 are answering these e-mails and they're doing
14 what they have to do.
15 Q. So you are saying the request
16 would have come in through an e-mail?
17 A. Yes.
18 Q. And to whose e-mail address?
19 A. It is usually it was Irina
20 Polkovnik at MTLWorld.com.
21 So, ma'am, I just want to point to
22 you, it could be anybody. It could be you who
23 sends this first information what you want to
24 get loaded. It could be Steve. It could be
25 Alex if he wants to ship on behalf of his

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1 A. SOLOVYEVA
2 customer, or it could be a customer. It could
3 be anybody.
4 So this department is basically
5 receiving all e-mails with requests.
6 Q. Did you work with Alex Solovyeva
7 directly? Did MTL and Alex have any
8 communications?
9 A. Well, usually how it happens that
10 Alex Solovyeva is just, you know, as a broker
11 he just sends the request, or his customers
12 might send request for the services and then
13 my loading department is just sending to me a
14 general e-mail. I even don't know who is the
15 customer because we have all rates for the
16 services like preset. It is basically almost
17 all the same. So it is, they send to me
18 request stating something like that.
19 Alla, how much it's going to cost
20 to ship out a vehicle or a boat this size from
21 the point A to point B?
22 So then I contact with the loading
23 manager, the loading manager outside who is
24 doing physical loading, and I ask him that,
25 what it will take to load this boat, if the

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1 A. SOLOVYEVA
2 cargo is oversized cargo, or it is not
3 vehicle. Because with the vehicles we always
4 know. Or it's the pallets, because it is
5 standard cargo.
6 So if it is not standard cargo, so
7 then I make a phone call or I send a text
8 message to the loading manager and ask him,
9 listen, what do you think how much it might
10 cost and how long time it will take you.
11 So he is giving me the numbers,
12 and he is telling me, this boat will go with
13 the turn on the side, this boat will go
14 straight, you can consolidate this boat with
15 something else. So it is just routine,
16 routine request.
17 And then I make my decision on how
18 I will export and what I can offer to the
19 customer and what I can produce as an income
20 for the company, and I send back e-mail to my
21 loading division or department and I'm saying,
22 okay, I have this boat, we can consolidate for
23 something else. Do you have any more units or
24 not? Or if the customer agrees to consolidate
25 with another vehicle, or this boat is too big

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1 A. SOLOVYEVA
2 and we cannot consolidate. It is going to be
3 a straight shipment.
4 So then I give the rate out and
5 usually salespeople -- so the loading
6 department is taking all information from the
7 customer, if they know this customer, if they
8 are just confirming if this customer will be
9 on the bill of lading as a shipper.
10 So they ask me or they ask my
11 sales department people to create a rate quote
12 in the system.
13 Based on the rate what I
14 produced -- and it is only on oversized cargo.
15 And then one of us, me or salespeople, we are
16 issuing rate quote and then the loading
17 department, based on this rate quote, is
18 requesting the loading and they requesting the
19 empty container from the trucking company and
20 so they load. This is their job on a daily
21 basis.
22 Q. Okay. I saw some invoices from
23 MTL to I think Royal Finance Group. Can you
24 explain what that's about, what the invoices
25 from MTL are in this case, because I think

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1 A. SOLOVYEVA
2 there has been some storage fees that either
3 MTL had to pay for in regards to the boats.
4 Can you clarify how that works with one
5 company paying for another company and then
6 invoicing each other. How did that work?
7 A. Well, we have separate businesses
8 and separate activities and we are not sharing
9 the same incomes.
10 So World Express is providing my
11 company with the loading and sometimes I am
12 asking --
13 Q. I'm sorry, can I stop you for a
14 second.
15 You said World Express provides
16 your company?
17 A. World Express. It is warehouse is
18 providing my company with the loading
19 services.
20 Q. But I thought we were, and correct
21 me if I am wrong, I thought MTL had its own
22 loading department?
23 A. No, loading it means the
24 documentation department. We do loading only
25 on a piece of paper. It is inside of the

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1 A. SOLOVYEVA
2 software what we have. And the loading,
3 physical loading, is World Express who is
4 outside.
5 Q. Because I thought he had mentioned
6 earlier that when you are trying to ascertain
7 a quote for oversized goods, you go outside to
8 your loading guy?
9 A. I don't go. I call. It is not
10 mine. What I said to you, it is the loading
11 manager, but it is not my manager. And he is
12 not, this loading manager is not an employee
13 of my company. So I'm just calling, because
14 since it is a manager and he is doing this
15 specific work, and he knows how to load, so I
16 am asking him how much and what it take to
17 load this oversized cargo.
18 Q. Who is the loading manager?
19 A. His name is Stoli.
20 MR. VENGROW: Where does he work?
21 Tell her where he works.
22 A. He works for World Express and
23 Connection.
24 Q. That's why I'm confused.
25 So your husband's company World

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1 A. SOLOVYEVA
2 Express and Connections, what is it, like next
3 door to MTL?
4 A. It's around the block. The other
5 side of the building we have, he has a lot and
6 all cargo from his customers are getting
7 accepted on this lot.
8 Q. Okay.
9 A. And then on the right side of this
10 lot, he has loading docks and he has, I don't
11 know how many teams of loaders. So they are
12 storing, they are accepting cargo, and then
13 they are loading this cargo inside of the
14 container.
15 Q. So I see here some invoices that
16 were produced to us from World Express and
17 Connections to MTL Transport Logistics Inc.
18 for the storage of the Formula boat at issue,
19 and the other two, the Chaparral and the
20 Monterey.
21 Can you explain how those invoices
22 came about. When did MTL receive those
23 invoices?
24 A. Ma'am, I'm not the accounting
25 department. I have three people working in

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1 A. SOLOVYEVA
2 the accounting department and all invoices,
3 and invoices from the vendors and invoices
4 from -- to the customers, my company
5 customers, they end up in accounting office,
6 and we have account payable, we have account
7 receivable and we have like a little helper.
8 So they receive their own invoices, and
9 whatever invoices they receive, it is their
10 job, their duties to find out for what
11 services and if it is legitimate invoices.
12 And then they have to see if they were paid
13 for the services my company provided. So then
14 they -- you see, it is routine accounting
15 work.
16 And since Marine Transport
17 Logistics is one of the customers of World
18 Express and Connection, so World Express and
19 Connection bills MTL every work what they are
20 doing for MTL. For example, they bill us for
21 the loading of every container. They give us
22 free time for the storage of the cargo, and
23 then they charge us for the storages if the
24 cargo is on storage for more than 30 days.
25 And this is basically it.

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1 A. SOLOVYEVA
2 Q. So the invoices that I'm talking
3 about, does MTL owe any money to World Express
4 and Connection in relation to this, for
5 storing the three boats, the Monterey, the
6 Chaparral and the Formula?
7 A. Well, I cannot say that. I'm not
8 sure if my accounting people paid for all the
9 storages. This, I cannot say you that.
10 Usually they pay because it is
11 working like magic. If the invoice has 30
12 days for the payment, they are not looking at
13 the numbers or something like that. They pay.
14 And they know that, you see, if we would not
15 pay, then World Express will stop loading of
16 the containers for my account.
17 Q. So in this case World Express and
18 Connections says that the total bill for
19 storing the three boats is about \$80,000.
20 Did MTL pay World Express and
21 Connections \$80,000 for the storage?
22 A. Ma'am. I just told you that I
23 cannot state what I -- I don't -- I don't
24 know. Because I told you the routine.
25 Usually, we pays for everything.

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1 A. SOLOVYEVA
2 But for this specific, I cannot
3 tell you because I did not get the money. I
4 did not deposit money into the bank, and you
5 see that I was not involved. I'm not the
6 accountant.
7 Q. I'm confused, because earlier you
8 stated that you signed the checks for MTL.
9 A. I sign the checks for the MTL, but
10 I told you that I'm signing -- do you know how
11 many checks I'm signing every day?
12 It's thousands of checks. My
13 checkbook for 700 checks -- it is not the
14 checkbook. It is preprinted forms -- usually
15 is gone in one month. And you are asking me
16 for something that happened like two years or
17 three years ago.
18 Q. Marine Transport Logistics also
19 issued their own invoices to Royal Finance
20 Group in this case.
21 A. Yes, because if Marine issued this
22 invoice, it is routine work inside of my
23 office.
24 So then the Royal Finance in this
25 transaction was like a broker or like

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1 A. SOLOVYEVA
2 sometimes Alex is doing -- I don't know, for a
3 customer, and he was acting on behalf of the
4 customer. So this is -- for this reason all
5 the storage charges is getting passed to the
6 right party, who is responsible for the
7 payment.
8 Q. So why would Royal Finance Group
9 be responsible for any invoicing from Marine
10 Transport Logistics?
11 A. I just explained you why just a
12 second ago.
13 Q. Maybe I didn't understand and
14 that's the point of this deposition is for you
15 to clarify certain facts.
16 So how was Royal Finance Group
17 involved in this transaction with Marine
18 Transport? Was there an agreement between
19 Royal Finance Group that they were going to do
20 certain things for Marine Transport Logistics?
21 A. You see, I cannot say what kind of
22 setup Alex and his company Royal Finance had
23 with Andrey Tretykov.
24 Q. No, I'm talking about directly --
25 A. Ma'am, I understand.

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1 A. SOLOVYEVA
2 MR. VENGROW: Be quiet. Let her
3 finish talking.
4 Go ahead, counsel.
5 Q. I'm asking what relationship and
6 what agreement Royal Finance Group had with
7 Marine Transport Logistics. I'm not talking
8 about anything else, just the two companies,
9 what was the agreement?
10 A. We don't have any agreements. It
11 just, you see, if my company was billed for
12 the storages, I have to pass these charges to
13 the right party. And at that moment the right
14 party was Royal Finance.
15 Q. Why was it the right party to pass
16 on the charges?
17 A. So then because Alex was acting as
18 the intermediate party between Andrey
19 Tretyikov and MTL. So this is why we passed
20 it to him.
21 Somebody is supposed to pay those
22 charges. It is not my charges. It is his
23 customers charges.
24 Q. I'm just confused and this is why
25 I'm confused. So Alex's company World Express

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1 A. SOLOVYEVA
2 and Connections sends MTL an invoice. Then
3 MTL sends an invoice back to another one of
4 Alex's companies which is Royal Finance Group.
5 Can you please clarify that for me. Because,
6 I'm telling you, it looks suspicious.
7 A. I don't know what looks suspicious
8 to you.
9 For example, you have two
10 apartments and each apartment is under a
11 different address and a different company, and
12 if, in fact, you received money from one of
13 your company, and the other company was not
14 paid for the rent, is going to be, look
15 suspicious in front of a judge? I don't think
16 so.
17 Alex has a different type of
18 activities in his life. He has different
19 businesses. And you see that his loading
20 business has nothing to do I believe with his
21 Royal Finance business, and he has, for this
22 reason, he has a different companies.
23 So one of his companies providing
24 my company with the loadings.
25 But I can request the loading from

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1 A. SOLOVYEVA
2 another company as well. This is what I'm
3 doing when I need to. I have a different
4 vendors and I'm using different services. Not
5 just Alex.
6 Q. And this is what I want to
7 clarify.
8 What did Royal Finance Group
9 request of Marine Transport Logistics? What
10 was the connection there?
11 A. Ma'am, I just stated you before.
12 Royal Finance --
13 Q. The reason I'm confused -- and let
14 me explain this; the reason I'm confused, you
15 say Alex. I want you to talk in the sense of,
16 you are talking about Alex as in Royal Finance
17 Group or --
18 A. I see, I'm sorry.
19 MR. VENGROW: I told you be
20 specific.
21 A. I'm sorry.
22 So Royal Finance -- you see that,
23 I'm not involved in daily routine.
24 My different departments in the
25 company are sending e-mails or invoices. They

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1 A. SOLOVYEVA
2 know how to do it because it is a routine for
3 them on daily basis.
4 If my company was billed for the
5 services, which services was not mentioned or
6 included in a rate quote, or out of the
7 ordinary, so then this, they -- usually, if it
8 is not something like, I don't know, out of
9 this world, and it is normal procedure and we
10 have this on a daily basis when we are getting
11 billed from warehouses, and they have five
12 different locations of the warehouses,
13 different warehouses almost in all -- it is in
14 all ports of the United States.
15 Q. Okay --
16 A. So they bill me.
17 I'm sorry, ma'am, hold on. Let me
18 finish it.
19 Q. It is not answering my question,
20 and I don't want to waste your time. I'm sure
21 you are paying your lawyer a lot of money to
22 sit here.
23 MR. VENGROW: Counsel --
24 Q. I would --
25 MR. VENGROW: Excuse me. She is

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1 A. SOLOVYEVA
2 still giving her answer as she believes
3 she is responding properly to you.
4 MS. TARASSOVA: That's not what
5 I'm looking for.
6 THE WITNESS: Ma'am, let me
7 finish, please. Let me finish.
8 MR. VENGROW: Be quiet.
9 You asked a question and she is
10 trying to give you an answer. Maybe you
11 believe it is not responsive to your
12 question, but she has a right to give
13 you her full answer, and I think you owe
14 her a courtesy to let her speak, and
15 then you can take that answer and bring
16 it back to what you really want.
17 MS. TARASSOVA: It is going on for
18 quite a long time, and I want to save
19 all the parties money.
20 Let me ask the question. Maybe I
21 wasn't specific enough.
22 Q. The question that I'm asking is
23 what role did Royal Finance Group play
24 specifically in this transaction with MTL?
25 That's it.

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1 A. SOLOVYEVA
2 What was your agreement? Why
3 would Royal Finance Group owe MTL money?
4 A. Because I believe that it was
5 Royal Finance customer who requested to export
6 and load boat out of United States, and Royal
7 Finance was involved in this chain.
8 So when warehouse -- warehouse is
9 billing my company for storage fees. It is
10 automatically we send these charges to the
11 next chain party, and in this chain it was
12 Royal Finance. And I believe that Royal
13 Finance at this point supposed to, if, of
14 course, the owner of this company wants to,
15 send these charges to his customer.
16 Q. I understand that. So can you
17 answer my question.
18 Am I correct in understanding that
19 Royal Finance had ordered the services from
20 MTL on their client's behalf?
21 A. This, I cannot speak to you if
22 Royal Finance was the company who ordered the
23 services. Most likely, Royal Finance was
24 involved maybe in financing, maybe helping to
25 purchase these boats, maybe -- I cannot say

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1 A. SOLOVYEVA
2 you that. Because Andrey -- Andrey Tretyikov
3 is a well-known person, and Andrey Tretyikov
4 was in the contact with the different
5 departments in my company, and he was sending
6 request for the loading himself.
7 So, you see, to tell you what the
8 role was between Andrey Tretyikov and the
9 Royal Finance, I cannot tell you that.
10 Q. That's not what I'm asking. What
11 I'm asking is if MTL was issuing invoices to
12 Royal Finance, there must have been some kind
13 of agreement or relationship.
14 Why, if you are getting requests
15 from Andrey Tretyikov, do you think, why
16 wouldn't you issue the invoice to Andrey
17 Tretyikov instead of Royal Finance Group?
18 That's where I'm confused.
19 A. Because --
20 MR. VENGROW: You can answer.
21 A. Because Andrey Tretyikov was
22 paying to Royal Finance, and Royal Finance was
23 paying to my company.
24 Q. Was there an agreement, like a
25 written agreement that Royal Finance would owe

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1 A. SOLOVYEVA
2 Marine Transport Logistics money?
3 A. There is no agreement, no. It is
4 common procedure. The customer is overseas
5 and they have no ability to pay for services.
6 So I gave you the sample before.
7 So if your friend or your mother
8 cannot pay for the services my company
9 provided to her, and it happens quite a lot,
10 so then she is asking you to pay for her.
11 I don't know what kind of
12 relationship you have with this person, is it
13 your mother, or you want just to give this as
14 a gift.
15 Q. I understand that Royal Finance
16 may have had some agreements and that you
17 can't answer those questions today because you
18 don't own Royal Finance. You are not an
19 appropriate representative for Royal Finance.
20 What you can answer are questions
21 about MTL's relationship with third parties.
22 What I'm asking you is
23 specifically the transactions, communications,
24 dealings, correspondence, things like that.
25 What did Marine Transport Logistics have with

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1 A. SOLOVYEVA
2 Royal Finance Group in connection to the
3 transactions that are at issue in this
4 lawsuit? So is it my understanding that you
5 are not sure?
6 A. No, it is not true. I just gave
7 you explanations back and forth.
8 Q. They were not clear.
9 A. I said the same thing from the
10 different angles, and we are going around the
11 same bushes.
12 MR. VENGROW: Why don't you
13 just –
14 THE WITNESS: I'm sorry.
15 MR. VENGROW: Just lower your
16 voice and answer the question.
17 A. I'm sorry. What I told you,
18 ma'am, Andrey Tretyikov was the regional
19 shipper, not Royal Finance. So we have, when
20 we are doing, producing bill of ladings and
21 the shipments, the bill of ladings are always
22 have a regional shipper information. So the
23 regional shipper was Andrey Tretyikov.
24 So in this case when you know who
25 the regional shipper is and who is that

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1 A. SOLOVYEVA
2 person, but this person was using Alex --
3 Royal Finance and Alexander Solovyeva as the
4 company he send the money to for the services,
5 and the Royal Finance paid for my company
6 services. And we have all of this recorded,
7 and they paid for the services. It is not
8 like it wasn't paid.
9 So they paid for this specific
10 services my company provided them with, and
11 then when my company received storage fees
12 from the warehouse, it could be not World
13 Express, because Andrey Tretyikov was
14 exporting vehicles and the boats from Miami as
15 well. So then we used a different warehouse.
16 So in that warehouse, if the cargo
17 were stored for more than 30 days, I would
18 still send the invoice from that warehouse,
19 which happens to be in Miami, to Royal
20 Finance.
21 But we all knew that the regional
22 shipper is Andrey Tretyikov. This is the
23 relationship.
24 Q. Who a Andrey Tretyikov?
25 A. Andrey Tretyikov is I believe

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1 A. SOLOVYEVA
2 Alex's customer and at that time -- you see,
3 that, I don't know what company he was dealing
4 with Alex. So it was his customer and his
5 location was in Jebel Ali.
6 Q. Is he a family friend?
7 A. No.
8 Q. Do you know him personally?
9 A. Well, I know all my customers
10 personally. We speak on Skype. They come to
11 my office. I have to know all my customers.
12 It is my due diligence.
13 Q. Okay. I'm a little bit confused
14 because earlier I thought I heard you say that
15 sometimes you are not even sure who your
16 customers are.
17 A. Because when we are doing routine
18 work, I don't know this specific loading or
19 request from which customer.
20 Q. Okay. I understand.
21 A. Because we have all rates preset.
22 It is all like a standard.
23 Q. I understand what you are saying,
24 and that is the point of this deposition is to
25 clarify, because that may be something you

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1 A. SOLOVYEVA
2 were thinking, but I did not know that's what
3 you meant.
4 So you are aware of who your
5 clients are. It is just that you are not sure
6 who specifically the request is coming from at
7 one time or another. Is that right?
8 A. Yes.
9 Q. So there was no written agreement
10 between Marine Transport Logistics and Royal
11 Finance. It was just verbal.
12 A. What was the agreement? What do
13 you mean by agreement?
14 Q. That you were going to Royal
15 Finance Group for certain service in these
16 three transactions and the transactions that
17 involved the Crocuses and Andrey Tretyikov, et
18 cetera?
19 A. If it is out of the ordinary, no.
20 Q. It is just verbal, mostly?
21 A. What verbal?
22 Q. Does Royal Finance, your husband,
23 call you and say, go ahead and invoice my
24 company for services?
25 A. I don't know -- I don't do

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1 A. SOLOVYEVA
2 invoices. I even don't know how to do them.
3 Ma'am, I just told you it is all
4 automatically if we are getting invoiced, so
5 then we pass these invoices to my company,
6 specific department. If bookkeeper received
7 the invoice, bookkeeper is looking in the
8 system and sees who is the company, who is
9 responsible for the payment. So then they
10 just forward these charges to the correct
11 person who is supposed to pay.
12 Q. Yes, I understand that.
13 What I'm asking is the agreement.
14 How do you know to invoice Royal Finance Group
15 and not invoice a company X? That agreement
16 has to be either verbal or in writing.
17 What I'm asking is, was there ever
18 a written agreement, or is it your normal
19 course of business to have it in writing where
20 Royal Finance Group tells you specifically, go
21 ahead and invoice me for any services that you
22 provide for the following shipping?
23 A. Ma'am. I think that you just
24 missed the point when I explained to you. You
25 see, this specific shipment, and it is very

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1 A. SOLOVYEVA
2 quite a lot, when a company located in the
3 United States, provide with some services, no
4 matter what. They even can sell an air to the
5 customer, big customer, and this customer is
6 located in Jebel Ali or in Alaska or anywhere
7 else in the world.
8 So the company in the United
9 States, they want to produce some income. And
10 how they can do it? They can produce with the
11 services they have, or they can purchase
12 services his customer needs from a company or
13 the party who have the services.
14 So Royal Finance had a customer
15 overseas. And it is not just one customer he
16 has. The Royal Finance has many different
17 customers. So when Royal Finance needs a
18 service. He orders the service from the
19 correct party. In this case it was my
20 company.
21 So Royal Finance orders from my
22 company, and his shipper, a regional shipper,
23 and it is supposed to be like that on the bill
24 of lading, was Andrey Tretyikov, because the
25 Royal Finance cannot be a regional shipper on

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1 A. SOLOVYEVA
2 the bill of lading because they are not a
3 regional shippers. It is against the law.
4 So he is the broker between --
5 Royal Finance, between my company and Mr.
6 Tretyikov. This is what I'm trying to explain
7 to you.
8 So there is no agreement verbally
9 or in writing at all. Royal Finance is acting
10 as a broker.
11 Is it clear?
12 MR. VENGROW: Don't become
13 aggravated.
14 Q. That order from Royal Finance
15 Group, how would it have come into MTL? Would
16 it have been through e-mail, or a phone call?
17 A. Usually it is e-mail. Usually.
18 But sometimes it can happen with
19 the phone call. Not from Alex. Not from the
20 Royal Finance.
21 So what we have, we have companies
22 located in the United States and we have
23 companies or private individuals located
24 overseas. Okay?
25 So, you see, that companies

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1 A. SOLOVYEVA
2 located overseas, they have difficulties to
3 purchase any goods in the United States
4 because they have problems to pay for those
5 goods in United States. For this reason they
6 are asking companies like Royal Finance -- and
7 I have a hundred other companies providing
8 with the services, people and the customers
9 overseas. You see? And they getting income
10 from this.
11 So -- because people overseas,
12 they don't know whom to trust, whom to send
13 the money, who will do the service the best
14 for them. So they are using this kinds of
15 brokers. And it is a very common procedure.
16 Because a lot of time -- a lot of
17 times, even if companies like Mr. Tretyikov
18 had, or his individual, when he is paying for
19 the goods in the United States, even he send
20 the money to United States, it can be
21 rejected.
22 Q. We are going way beyond my
23 question.
24 My question is how do the requests
25 from Royal Finance Group come --

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1 A. SOLOVYEVA
2 A. Let me continue. I understand.
3 So what Andrey Tretyikov was
4 doing, and many different accounts overseas
5 are doing, they are sending --
6 Q. Let's talk about specifically this
7 case.
8 A. I don't know specifically about
9 this case because I was not involved in
10 e-mails.
11 Q. Okay. So let's pause for a
12 second. And I have a question for --
13 A. Ma'am, can I finish, please. Let
14 me just finish this a couple of sentences.
15 MS. TARASSOVA: It wouldn't help.
16 Just give me one second. Let the
17 lawyers deal with this.
18 Mr. Vengrow, I have an issue here
19 because this was something that was
20 noticed on the notice of deposition for
21 the corporate rep. It is actually No.
22 4.
23 MR. VENGROW: Okay. She can
24 answer it.
25 What you should have done, quite

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1 A. SOLOVYEVA
2 frankly, is pointed to No. 4 at the
3 beginning of her deposition.
4 And now give your answer, Alla.
5 MS. TARASSOVA: That's not a
6 question. No. 4 is not a question.
7 MR. VENGROW: It is a subject
8 matter.
9 MS. TARASSOVA: It is --
10 A. But you do not let me finish.
11 MS. TARASSOVA: So my concern,
12 and let me just tell you what my concern
13 is and maybe you can cure that, is right
14 now Ms. Solovyeva is saying she does not
15 know specifically because she wasn't
16 dealing with this.
17 So my question is, has she been
18 apprised of the information for purposes
19 of this deposition of the corporate
20 representative. I'm not asking her as
21 far as her personal knowledge of it.
22 She should have been apprised --
23 MR. VENGROW: She was. You gave
24 her the subject matter and she answered
25 your subject matter question.

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1 A. SOLOVYEVA
2 What you should be doing, quite
3 frankly, is providing her with documents
4 specifically what you have and which was
5 sent over to us and ask questions on
6 that. And you are just confusing the
7 matter --
8 MS. TARASSOVA: I don't have any
9 documents I want to use as an exhibit
10 for this deposition. I'm asking her
11 about No. 4.
12 A. Ma'am, I am trying to explain to
13 you.
14 MR. VENGROW: Be quiet. Please,
15 be quiet.
16 I'm just saying to you she
17 answered that topic as best she could.
18 You may not like the answer, but that's
19 it.
20 MS. TARASSOVA: My problem, and
21 I'm trying to allow you to cure this
22 issue because I don't want to have to
23 file a motion to compel.
24 My problem is that she is saying
25 she is not apprised of the information

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1 A. SOLOVYEVA
2 because she doesn't deal with that
3 department. For purposes of a corporate
4 rep depo, she is supposed to have
5 obtained the information.
6 MR. VENGROW: No, the purpose of
7 this deposition is to talk to these
8 subjects that you brought up. And you
9 ask appropriate questions.
10 Your questions are broad, vague
11 and confusing. They really are without
12 documents. That's a problem we are
13 facing.
14 MS. TARASSOVA: That's fine. If
15 you don't want to take this opportunity
16 to cure, we will just deal with it
17 later. I'm just letting you cure it now
18 and I'm bringing it up and making a good
19 faith effort to bring this up and deal
20 with it now.
21 If you think that her questions or
22 her answers are sufficient enough, then,
23 absolutely, you know best.
24 A. So maybe, can I finish what I was
25 trying to tell you what is the routine? And

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1 A. SOLOVYEVA
2 it is a usual routine.
3 MS. TARASSOVA: Hold on one
4 second. I'm not sure that we are on the
5 record.
6 Do you want to take a five-minute
7 break really quick?
8 THE WITNESS: No, I don't want to
9 take any break.
10 MS. TARASSOVA: I need a 5-minute
11 break, and so I will be doing that and I
12 will be back in five minutes.
13 (Recess taken.)
14 BY MS. TARASSOVA:
15 Q. Ms. Solovyeva, do you know about
16 any communications that had occurred between
17 Marine Transport Logistics and Royal Finance
18 Group in connection with this case?
19 A. No.
20 Q. Can you talk about the, any
21 correspondence that Marine Transport Logistics
22 would have had with Royal Finance in relation
23 to the matters or the parties at issue in this
24 case?
25 A. No. It's -- if it is between

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1 A. SOLOVYEVA
2 departments, no.
3 Q. What about any e-mails or anything
4 like that, could they be in existence, you
5 were just not aware of them today?
6 MR. VENGROW: E-mails between who?
7 MS. TARASSOVA: Royal Finance
8 Group and Marine Transport Logistics.
9 A. If it is between departments, then
10 I don't know about this correspondence. It is
11 a normal working routine.
12 Q. I understand. And when you say
13 departments, you are talking about departments
14 within Marine Transport Logistics?
15 A. Exactly.
16 Q. Were there any communications that
17 took place between Marine Transport Logistics
18 and the Crocuses, either the Crocus in Dubai
19 or the Crocus in Florida?
20 A. Excuse me? I didn't hear that.
21 Can you please repeat.
22 Q. Sure. Are there any
23 communications that occurred between Marine
24 Transport Logistics and either Crocus FZE or
25 Crocus LLC?

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1 A. SOLOVYEVA
2 A. Ma'am, I don't know that. If it
3 was between departments or not, I cannot say
4 that. I was not involved in the e-mails.
5 Q. Who would know that, Ms.
6 Solovyeva?
7 A. The credit department. If the
8 e-mail was sent to somebody in my office, one
9 of the employees, then this person would know
10 that.
11 It is just the routine work. We
12 are receiving e-mails on a daily basis and
13 answer them.
14 Q. My problem that I'm having right
15 now, and I want to put this on the record, is
16 that we served the notice of deposition to
17 Marine Transport Logistics which is your
18 company.
19 A. Um-hmm.
20 Q. Today will be the time that we
21 will be discussing items No. 1 through 16.
22 A. Okay.
23 Q. Your attorney has stated that you
24 are the corporate representative for Marine
25 Transport Logistics and you are prepared to

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1 A. SOLOVYEVA
2 discuss items 1 through 16 on the notice of
3 deposition.
4 A. I am, but I told you before that
5 Crocus was never my customer and for this
6 reason I was not involved in any e-mails and
7 then, I believe that any of my employees were
8 involved in any e-mails. Nobody heard before
9 about this company.
10 Q. The question is do you know if
11 there are e-mails or have you even looked to
12 see if there are e-mails? That's what I'm
13 asking.
14 A. Ma'am, I didn't see any e-mails
15 between me or my employees and Crocus. I
16 didn't see them.
17 Q. So they do not exist, is that what
18 you are saying?
19 A. I didn't say that. I told you I
20 didn't see them.
21 Q. What do you mean you didn't see
22 them? A person cannot see something, either,
23 one, they didn't look, or, two, they looked,
24 they just couldn't find.
25 Which category do you fit into?

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1 A. SOLOVYEVA
2 Did you look and you couldn't find, or you
3 just didn't even look?
4 A. My question: Where would I go and
5 look?
6 MR. VENGROW: Don't do that,
7 please. She asks the questions.
8 THE WITNESS: I know, but -
9 MR. VENGROW: Please, just answer
10 the questions as best your ability, and
11 it will make your life a lot easier.
12 A. I have 12 computers and 12
13 employees, and I have - I don't know where to
14 go and where to look, unless I have my own
15 computer and I receive something on my
16 computer.
17 MR. VENGROW: Counsel, do you have
18 any indication that there are e-mails
19 between MTL and Crocus?
20 MS. TARASSOVA: I'm asking her the
21 questions.
22 MR. VENGROW: I'm asking you the
23 question because you are making a lot of
24 this, and it may be a lot about nothing.
25 That's why I'm wondering.

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1 A. SOLOVYEVA
2 If you have those e-mails, you
3 should at least point them out to us.
4 MS. TARASSOVA: I'm not trying to
5 trick Ms. Solovyeva. I'm simply asking
6 discovery questions, and that is my
7 prerogative.
8 The way that she answered it, is
9 perfectly fine. I'm ready to move on to
10 the next subject. I've got what I need
11 on the record. Thank you.
12 Q. Do you know about the agreement,
13 did Marine Transport Logistics provide
14 transportation for two of the boats, the
15 Chaparral and the Monterey, to Dubai?
16 MR. VENGROW: Answer the question.
17 A. Transportation?
18 What transportation? You mean
19 transportation on the vessel?
20 Q. Correct.
21 A. Yes.
22 Q. So that was what you are saying
23 was ordered by Royal Finance Group that Mr.
24 Tretyikov was the shipper. Is that the
25 transaction you are talking about?

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1 A. SOLOVYEVA
2 A. Yes.
3 Q. Did they eventually make it to
4 Dubai, the two boats?
5 A. Well, my documentation department
6 was supposed to know that. I guess they did
7 make it if they were sent out.
8 Q. But you are guessing right now.
9 Do you know for sure?
10 A. Yes.
11 MR. VENGROW: Is this, counsel, is
12 this still an issue? I thought that was
13 resolved at an earlier time.
14 MS. TARASSOVA: Let me ask my
15 questions.
16 MR. VENGROW: Well, no, because
17 you are wasting my time now, or my
18 client's time.
19 I don't think there is any issue
20 with regard to when those boats were
21 delivered and where and coming back.
22 You agreed to that and you said that
23 statement at one time. That's why I
24 wondered.
25 If you have a real question, go to

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1 A. SOLOVYEVA
2 it.
3 Q. Ms. Solovyeva, did the boats make
4 it to Dubai?
5 A. Yes.
6 Q. Were the boats eventually shipped
7 through MTL back to New Jersey from Dubai?
8 MR. VENGROW: What do you mean
9 through MTL?
10 MS. TARASSOVA: Mr. Vengrow, I
11 would really ask you not to comment, and
12 let the witness answer the questions.
13 If she has a question about what I'm
14 asking -
15 MR. VENGROW: Counsel, I'm trying
16 to help you here.
17 You are talking about a maritime
18 transportation, and words are very
19 specific when you are talking about
20 movement of vehicles or cargo back and
21 forth between countries.
22 Q. Can you answer the question,
23 please.
24 A. Ma'am, I didn't understand your
25 question because you see that you are not, I

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1 A. SOLOVYEVA
2 believe, a maritime lawyer, and I'm in this
3 business for 20 years -- over 20 years.
4 So your question is not clear to
5 me. I don't understand it.
6 What do you mean through MTL?
7 MTL is just providing customers
8 with the slot on the vessel because they are
9 not allowed to do the bookings themselves.
10 Q. Right. And that's what I mean.
11 Did MTL provide that for the complainants, to
12 bring the boats back from Dubai to New Jersey?
13 That's it.
14 A. For the complainants?
15 Q. Yes.
16 A. Who is the complainants? What do
17 you mean complainants?
18 MR. VENGROW: Talking about
19 Crocus.
20 A. Crocus?
21 MR. VENGROW: Yes.
22 A. You see, I don't believe that I
23 provided any services for Crocus.
24 Q. You did not provide, MTL did not
25 provide any services to Crocus?

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1 A. SOLOVYEVA
2 A. No.
3 Q. Who did MTL provide services to?
4 A. For the company on record.
5 MR. VENGROW: Bill of lading
6 shipper, counsel. She has answered that
7 about five times now.
8 Q. So you are saying Royal Finance
9 Group --
10 A. Royal Finance Group was not a
11 regional shipper.
12 Q. Mr. Tretykov was?
13 A. For the regional shipper, yes.
14 Q. And when you are talking about --
15 this is where it is confusing.
16 When you are talking about Mr.
17 Tretykov, are you talking about a company
18 that he owned or worked for, or are you
19 talking about him as an individual?
20 A. Ma'am --
21 MR. VENGROW: Just answer the
22 question.
23 A. Okay. Ma'am, I believe that he
24 had the company, and if it was a company, then
25 the company was the regional shipper. And the

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1 A. SOLOVYEVA
2 bill of lading was issued on behalf of this
3 company. If he used his own name, then he was
4 the regional shipper.
5 Q. On that bill of lading, what does
6 it say?
7 A. Which bill of lading are you
8 talking about?
9 Q. From Dubai to New Jersey.
10 A. Because you see that overseas
11 every -- let's put it this way. Every country
12 has its own rules, and you, as an individual,
13 are not allowed to send anything out of the
14 country in Dubai. I believe so. Without a
15 proper party.
16 And I believe that the proper
17 party in this case is supposed to be a
18 company. Usually this company is the agent,
19 and it is a proper agent with the agent
20 license overseas. So this agent was with the
21 agent's license overseas, can file
22 electronically shippers export declaration,
23 and then if -- in this case, they can act as
24 the regional shipper when the cargo is coming
25 back.

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1 A. SOLOVYEVA
2 Q. So does MTL assist clients -- say
3 you have a client overseas and they contact
4 MTL and they say I need to ship something from
5 Dubai to New Jersey. Even though MTL may not
6 be the proper agent or party, would MTL be
7 able to assist clients with that?
8 A. MTL is located in the United
9 States and MTL is providing with the space on
10 the vessel, and in order to ship something in
11 or out, you have to use correct parties.
12 Q. And was that party you?
13 A. Well, ma'am, you see it is daily
14 routine and --
15 MR. VENGROW: Do you recall the
16 cargo? Was MTL involved in getting the
17 two boats back from Dubai to New York?
18 If you know.
19 THE WITNESS: I don't, because I
20 don't know if we did the booking or
21 somebody else did the booking.
22 MR. VENGROW: The way you would
23 know would be by looking at the bill of
24 lading when it arrived?
25 THE WITNESS: Yes.



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1 A. SOLOVYEVA
2 MR. VENGROW: And then you would
3 be able to talk --
4 THE WITNESS: Yes.
5 MR. VENGROW: Counsel, can you
6 tell her who the bill of lading shipper
7 was and who the bill of lading consignee
8 was.
9 MS. TARASSOVA: No, I'm asking the
10 corporate representative for MTL.
11 A. It is general.
12 MS. TARASSOVA: If she doesn't
13 know, she can put on the record she has
14 no idea.
15 MR. VENGROW: She didn't say that.
16 She is saying if she had the bill of
17 lading, she can answer your question
18 very specifically, and you are not
19 providing it and you have that document.
20 MS. TARASSOVA: I don't have it
21 with me right now, and I'm not trying to
22 hide it. She has access to it, just as
23 I do.
24 MR. VENGROW: Yeah, and we didn't
25 bring any documents with us, and you

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1 A. SOLOVYEVA
2 didn't send us any documents.
3 So, consequently, if you want to
4 talk about a shipment coming back from
5 Dubai, you should be at least referring
6 to the document.
7 MS. TARASSOVA: Can we go off the
8 record.
9 (Discussion off the record.)
10 MS. TARASSOVA: Let's go back on
11 the record.
12 Q. Ms. Solovyeva, have you and your
13 husband ever talked about the transactions as
14 they were happening? Have you discussed with
15 Mr. Solovyeva about this case?
16 A. Ma'am, I don't understand.
17 Q. Have you and Mr. Solovyeva, your
18 husband, discussed the facts of this case, as
19 they were happening in 2013 and '14, have you
20 ever heard from your husband? Has he ever
21 said anything about Mr. Tretyikov or the
22 Crocuses and Mr. Safonov? Have you guys ever
23 discussed these issues?
24 A. I don't believe so, because I have
25 containers coming back on a weekly basis. I'm

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1 A. SOLOVYEVA
2 in the shipping business. Back and forth. So
3 I'm not even involved in this routine. It's a
4 routine. So we are sending and we are
5 receiving.
6 Q. Okay.
7 A. And we are loading.
8 Q. But, casually, you have not
9 discussed these issues with your husband?
10 A. I didn't have any issues. I was
11 just requested to send something outside of
12 the country, and then I believe that my
13 company was the consignee for the cargo coming
14 from another country. And I have this on a
15 daily basis.
16 So whether my company is the
17 consignee or the agent for the import, my job
18 is to unload the cargo, to act as the proper
19 agent and provide with the unloading and
20 that's it.
21 Q. Have you ever been convicted of a
22 crime?
23 A. No.
24 Q. Have you ever been sued?
25 A. Personally?

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1 A. SOLOVYEVA
2 Q. Correct.
3 A. No.
4 Q. You have never been sued?
5 A. I don't remember. I don't recall.
6 Q. Have you ever been named as a
7 party in a lawsuit individually, along with
8 Marine Transport Logistics?
9 A. Yes.
10 Q. How many times?
11 A. I cannot recall that.
12 Q. Is it more than one time?
13 A. I cannot recall that. Maybe one,
14 maybe two times. I don't remember.
15 Q. You have no idea?
16 A. No.
17 MR. VENGROW: And she wouldn't,
18 because, counsel, maybe I will help you
19 out.
20 A. For 20 years.
21 MR. VENGROW: If you want to put a
22 written request. We don't understand
23 the relevancy of that line of
24 questioning, but out of deference to
25 you, if you put your request in writing

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1 A. SOLOVYEVA
2 beyond being specific, we will do our
3 best to respond to it.
4 We have been representing them for
5 quite a while.
6 MS. TARASSOVA: The point of the
7 deposition is for her to give me
8 realtime answers.
9 That's fine. I will take her
10 answer for what it is. It is on the
11 record.
12 MR. VENGROW: You have an
13 opportunity, we will give you the docket
14 numbers and the case numbers.
15 What's the time frame? That's
16 what I need.
17 Q. I'm talking about for the last ten
18 years, Ms. Solovyeva, how many times have you
19 been sued?
20 MR. VENGROW: Ten years? That's a
21 long time.
22 A. Maybe three, maybe four times.
23 Personally.
24 MR. VENGROW: You. Personally.
25 A. I don't know. MTL. With the MTL.

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1 A. SOLOVYEVA
2 MR. VENGROW: That's what I
3 thought. We will provide -- just put it
4 in writing.
5 MS. TARASSOVA: Let me ask the
6 questions, Mr. Vengrow.
7 I will file my requests if I need
8 to. Let me ask my questions in the
9 deposition.
10 Q. Ms. Solovyeva, so you said maybe
11 how many times?
12 MR. VENGROW: She answered your
13 question.
14 A. With the MTL, as a part of the
15 MTL.
16 Q. So they are two separate things
17 I'm asking.
18 Number one, the first question I
19 asked was, how many times have you been sued
20 as an individual where your name, Alla
21 Solovyeva, was in the complaint?
22 A. But if my name was just -- just my
23 name? Or my name and the company?
24 Q. Your name anywhere, whether it
25 stands by itself or it stands --

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1 A. SOLOVYEVA
2 A. I never was sued as Alla Solovyeva
3 without the company.
4 (Lost video conference
5 transmission.)
6 BY MS. TARASSOVA:
7 Q. Was the company Marine Transport
8 Logistics ever sued?
9 A. Yes.
10 Q. How many times?
11 A. Ma'am, I cannot recall that, how
12 many times.
13 Q. What was it sued for?
14 A. For --
15 MR. VENGROW: Excuse me. You are
16 asking legal questions right now. I
17 suggest to you, if you want, you give us
18 a time frame, we will come back and give
19 you the name of the case.
20 Can you hear me, because your
21 picture is not there? Your photo.
22 MS. TARASSOVA: I can hear you.
23 I'm sorry. I'm nodding, but I guess you
24 can't see that.
25 MR. VENGROW: We will give you the

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1 A. SOLOVYEVA
2 names of the cases and the docket
3 numbers, but they are all
4 maritime-related.
5 MS. TARASSOVA: I'm sorry, what?
6 MR. VENGROW: They are all
7 maritime-related.
8 Q. Ms. Solovyeva, had Marine
9 Transport Logistics ever been sued in a
10 non-maritime capacity?
11 A. Small claim court?
12 Q. No. In any court, not related to
13 maritime law.
14 A. No.
15 MS. TARASSOVA: I don't have any
16 more questions. So if you have any
17 questions, Mr. Vengrow.
18 MR. VENGROW: No.
19 MS. TARASSOVA: You said no?
20 MR. VENGROW: Yes. The answer is
21 no.
22 MS. TARASSOVA: Okay. Thank you.
23 That's all I guess.
24 Is there anyone else that is a
25 corporate representative, or is that it

<p style="text-align: right;">Page 85</p> <p>1</p> <p>2 DEPOSITION ERRATA SHEET</p> <p>3 Page No. ____ Line No. ____ Change to: ____</p> <p>4 _____</p> <p>5 Reason for change: _____</p> <p>6 Page No. ____ Line No. ____ Change to: ____</p> <p>7 _____</p> <p>8 Reason for change: _____</p> <p>9 Page No. ____ Line No. ____ Change to: ____</p> <p>10 _____</p> <p>11 Reason for change: _____</p> <p>12 Page No. ____ Line No. ____ Change to: ____</p> <p>13 _____</p> <p>14 Reason for change: _____</p> <p>15 Page No. ____ Line No. ____ Change to: ____</p> <p>16 _____</p> <p>17 Reason for change: _____</p> <p>18 Page No. ____ Line No. ____ Change to: ____</p> <p>19 _____</p> <p>20 Reason for change: _____</p> <p>21 Page No. ____ Line No. ____ Change to: ____</p> <p>22 _____</p> <p>23 Reason for change: _____</p> <p>24 SIGNATURE: _____ DATE: _____</p> <p style="text-align: center;">ALLA SOLOVYEVA</p> <p>25</p>									
<p style="text-align: right;">Page 86</p> <p>1</p> <p>2 November 19, 2015</p> <p>3</p> <p>4</p> <p>5 I N D E X</p> <table border="0"><tr><td style="width: 60%;">6 EXAM BY</td><td style="width: 40%;">PAGE</td></tr><tr><td>7 Ms. Tarassova</td><td style="text-align: center;">4</td></tr></table> <p>8</p> <p>9 E X H I B I T S</p> <table border="0"><tr><td style="width: 60%;">10 FOR IDENTIFICATION</td><td style="width: 40%;">PAGE</td></tr><tr><td>11 (None marked.)</td><td></td></tr></table> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	6 EXAM BY	PAGE	7 Ms. Tarassova	4	10 FOR IDENTIFICATION	PAGE	11 (None marked.)		
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7 Ms. Tarassova	4								
10 FOR IDENTIFICATION	PAGE								
11 (None marked.)									

<p style="text-align: right;">Page 1</p> <p>1 2 FEDERAL MARITIME COMMISSION 3 DOCKET NO.: 15-04 4 -----X 5 CROCUS INVESTMENTS, LLC AND CROCUS, FZE 6 Complainants 7 v. 8 MARINE TRANSPORT LOGISTICS, INC. AND ALEKSANDR 9 SOLOVYEV a/k/a ROYAL FINANCE GROUP INC. 10 Respondents 11 -----X 12 1384 Broadway 13 New York, New York 10018 14 November 20, 2015 15 10:13 a.m. 16 17 EXAMINATION BEFORE TRIAL of ALEKSANDR 18 SOLOVYEV, the Defendant in the above-entitled 19 action, taken on behalf of the Plaintiffs, held 20 at the above time and place, and taken before 21 Dorene Glover, a reporter and Notary Public 22 within and for the State of New York. 23 24 25</p>	<p style="text-align: right;">Page 3</p> <p>1 2 IT IS HEREBY STIPULATED AND AGREED by and 3 between the attorneys for the respective 4 parties herein, and in compliance with Rule 221 5 of the Uniform Rules for the Trial Courts: 6 THAT the parties recognize the provision of 7 Rule 3115 subdivisions (b), (c), and/or (d). 8 All objections made at a deposition shall be 9 noted by the officer before whom the deposition 10 is taken, and the answer shall be given and the 11 deposition shall proceed subject to the 12 objections and to the right of a person to 13 apply for appropriate relief pursuant to 14 Article 31 of the CPLR. 15 THAT every objection raised during a 16 deposition shall be stated succinctly and 17 framed so as not to suggest an answer to the 18 deponent and, at the request of the questioning 19 attorney, shall include a clear statement as to 20 any defect in form or other basis of error or 21 irregularity. Except to the extent permitted 22 by CPLR Rule 3115 or by this rule, during the 23 course of the examination persons in attendance 24 shall not make statements or comments that 25 interfere with the questioning.</p>
<p style="text-align: right;">Page 2</p> <p>1 2 APPEARANCES: 3 4 THE LAW OFFICE OF LOUIZA TARASSOVA, P.A. 5 Attorneys for Complainants 6 1420 Lake Baldwin Lane 7 Orlando, Florida 32814 8 BY: LOUIZA TARASSOVA, ESQ. 9 10 CICHANONICZ, CALLAN, KEANE, VENGROW & TEXTOR, 11 LLP. 12 Attorneys for Respondents 13 61 Broadway 14 New York, New York 10006 15 BY: ERIC CHANG, ESQ. 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 2 THAT a deponent shall answer all questions 3 at a deposition, except (i) to preserve a 4 privilege or right of confidentiality, (ii) to 5 enforce a limitation set forth in an order of a 6 court, or (iii) when the question is plainly 7 improper and would, if answered, cause 8 significant prejudice to any person. An 9 attorney shall not direct a deponent not to 10 answer except as provided in CPLR Rule 3115 or 11 this subdivision. Any refusal to answer or 12 direction not to answer shall be accompanied by 13 a succinct and clear statement of the basis 14 therefore. If the deponent does not answer a 15 question, the examining party shall have the 16 right to complete the remainder of the 17 deposition. 18 THAT an attorney shall not interrupt the 19 deposition for the purpose of communicating 20 with the deponent unless all parties consent or 21 the communication is made for the purpose of 22 determining whether the question should not be 23 answered on the grounds set forth in section 24 221.2 of these rules and, in such event, the 25 reason for the communication shall be state for</p>



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1
2 the record succinctly and clearly.
3 THAT failure to object to any question or to
4 move to strike and testimony at this
5 examination shall not be a bar or waiver to
6 make such objection or motion at the time of
7 the trial of this action, and is hereby
8 reserved; and
9 THAT this examination may be signed and
10 sworn to by the witness examined herein before
11 any Notary Public, but the failure to do so or
12 to return the original of the examination to
13 the attorney on whose behalf the examination is
14 taken shall not be deemed a waiver of the
15 rights provided by Rules 3116 and 3117 of the
16 CPLR, and shall be controlled thereby, and
17 THAT certification and filing of the
18 original of this examination are waived; and
19 THAT the questioning attorney shall provide
20 counsel for the witness examined herein with a
21 copy of this examination at no charge.
22
23
24
25

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1
2 ALEKSANDR SOLOVYEV,
3 the witness herein, having first been duly
4 sworn
5 by a Notary Public of the State of New York,
6 was
7 examined and testified as follows:
8 EXAMINATION BY
9 MS. TARASSOVA:
10 Q. Please state your name for the
11 record.
12 A. Aleksandr Solovyev.
13 Q. Please state your address.
14 A. 2820 Ocean Parkway, Brooklyn, New
15 York 11223.
16 Q. Good morning, Mr. Solovyev. Can
17 you hear me well?
18 A. Good morning, yes.
19 Q. Have you ever been to a deposition
20 before?
21 A. Yes.
22 Q. How many times would you say?
23 A. Don't remember.
24 Q. Do you know approximately? I'm not
25 asking for a specific number. I'm looking for

Page 7

1 SOLOVYEV
2 a range between one and five, five and ten, ten
3 to 15; how many would you say?
4 A. Two.
5 Q. What were those cases?
6 A. I don't remember.
7 Q. Do you know how long ago they were?
8 A. Ten years ago.
9 Q. I am sure at that time they
10 explained the ground rules to you but I'm going
11 to remind you about the ground rules of the
12 deposition today again.
13 I am going to assume that you
14 understood my question unless you tell me that
15 you did not. And ask me to rephrase it or
16 restate it; do you understand?
17 A. Understand.
18 Q. So sometimes lawyer tend to want to
19 get their thoughts out and it don't come out as
20 well as we have them in our minds. Stop me and
21 say can you rephrase that, I don't understand
22 and I'll be happy to do that, okay.
23 A. Yes.
24 Q. Answer just like you would if the
25 judge was here. Everything is being recorded

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1 SOLOVYEV
2 and it will be used in a hearing at a later
3 time. So if you truly do not remember then go
4 ahead and state so, but remember if you
5 suddenly remember or recall facts at a hearing
6 or at a trial, it will be basically used
7 against you; do you understand that?
8 A. Yes.
9 Q. Also, and you're doing a very good
10 job but I want to remind you to give verbal
11 responses. Sometime we tend to nod shakes our
12 heads when we agree or disagree and I do want
13 you to say yes or no; do you understand that?
14 A. Yes.
15 Q. I see that you are on your phone
16 right now; what are you doing?
17 A. Giving constructions.
18 Q. I would ask that you pay complete
19 and full attention today to the deposition. It
20 is very important that you are completely
21 participating in this because like I said,
22 everything's being recorded and if you give a
23 wrong answer, if you're distracted, it will be
24 used against you; do you understand that?
25 A. Yes.



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1 SOLOVYEV
2 MR. CHANG: Louiza, if he gets a
3 business phone call and he needs to have
4 quick break, can we just let you know
5 and you'll stop questioning. Obviously
6 if there's a pending question, we'll
7 have him answer before he leaves. I
8 think the reason he's on his phone is
9 because he getting calls almost nonstop
10 throughout the day for work.
11 MS. TARASSOVA: Okay, Eric, that's
12 fine.
13 Q. As you know from doing previous
14 depositions, in your career, breaks are totally
15 fine but when you're talking about constant
16 phone calls, that's not going to work and so
17 that brings me to my next question: Mr.
18 Solovyev, is there anything that may be
19 distracting you today in preventing you from
20 being able to have participate fully in this
21 deposition?
22 A. No.
23 Q. So you're prepared to do this
24 deposition? You're going to be fully focused;
25 is that correct?

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1 SOLOVYEV
2 A. I am fully focused.
3 Q. Okay, perfect. And throughout the
4 deposition, you're attorney may be objecting to
5 certain questions. That's absolutely normal go
6 ahead and stop your answer. Let us put what we
7 need to put on the record and then proceed to
8 answer once you've been instructed to do so,
9 okay.
10 A. Okay.
11 Q. And finally, are you on any type of
12 medication today that would prevent you from
13 remembering certain facts?
14 A. Not yet.
15 Q. What do you mean not yet? Do you
16 think you might need to take some medication
17 later today that might prevent you from
18 remembering certain facts?
19 A. Let's see which say you're going
20 today. Maybe you're going to make it crazier
21 and I will need some Tylenol.
22 Q. Do you think Tylenol might prevent
23 you from remembering?
24 A. I don't know yet. Let's start
25 working.

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1 SOLOVYEV
2 Q. Okay, perfect.
3 You mentioned that -- well, let's
4 start from the beginning: What is your current
5 home address?
6 A. 2820 Ocean Parkway.
7 Q. Okay, what state is that in?
8 A. New York. Brooklyn, New York.
9 Q. And how long have you lived at that
10 address?
11 A. Three years.
12 Q. And where did you live prior to
13 that address?
14 A. I don't remember. It was the same
15 building. I moved to a new apartment. I don't
16 remember what building number it was. I don't
17 remember now. The same area.
18 Q. It was also at 2820 that building?
19 A. No, different numbers.
20 Q. Have you ever -- are you married?
21 A. Separated.
22 Q. But legally you are married right
23 now?
24 A. No, separated.
25 Q. Have you gotten a divorce?

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1 SOLOVYEV
2 A. No.
3 Q. And what is the name of your spouse
4 who you're separated from?
5 A. Allah Solovyev.
6 Q. What address does she live at?
7 A. 420 Jensen Street, Staten Island,
8 New York.
9 Q. Have you ever lived at that
10 address?
11 A. No.
12 Q. So you never lived at that address
13 with your wife?
14 A. No.
15 Q. What is your cellphone number?
16 MR. CHANG: Is this something he
17 can check?
18 MS. TARASSOVA: Absolutely. The
19 other rule that I forgot, this is not a
20 quiz. If you do need to refer to
21 something in your phone or if there's
22 some documents, go ahead and do that.
23 That's not a problem. I want you to
24 give accurate answers.
25 A. 646-725-1355.

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1 SOLOVYEV
2 Q. Have you ever had a cellphone
3 number that was 646-725-1335?
4 A. Yes, this is my number, yes.
5 Q. 1335?
6 A. Yes.
7 Q. Is that a different cellphone
8 number from the one you just gave me that ends
9 with 1355?
10 A. Did I?
11 Q. The phone number you just gave me
12 was 646-725-1355?
13 A. No, 1335.
14 Q. How long did you have the cellphone
15 number?
16 A. Way too long.
17 Q. Pretty long. How much --
18 approximately how many years would you say?
19 A. Five years.
20 Q. And did you use the cellphone
21 number throughout the time that the dispute is
22 about? This case -- it's from the transactions
23 happened between 2013 and 2014, did you use
24 that cellphone number at the time?
25 A. Yes.

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1 SOLOVYEV
2 Q. And did you have any other
3 cellphone numbers that you used at the time?
4 A. Yes.
5 Q. And what was the number for that?
6 A. 201-467-5205.
7 Q. Did you use the cellphone number
8 during the time that the transactions occurred?
9 A. Yes.
10 Q. And did you have any other
11 cellphone in the United States of Americas
12 besides those two that you gave me?
13 A. No.
14 Q. Did you have an office number that
15 you used?
16 A. Yes.
17 Q. And how many office numbers did you
18 have at the time?
19 A. No, no, no, sorry, no.
20 Q. No landline?
21 A. No landline.
22 Q. And did you have an e-mail address
23 that you used during the transactions?
24 A. Yes.
25 Q. How many e-mail addresses did you

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1 SOLOVYEV
2 have?
3 MR. CHANG: During the 2013 or 2014
4 period?
5 MS. TARASSOVA: Correct, yes.
6 A. It was two e-mails.
7 Q. What is the first e-mail address?
8 A. Worldexpress2010@gmail.com.
9 Q. And what was the next e-mail
10 address?
11 A. Alex -- no, no, sorry.
12 MTLworld@MTLworld.com.
13 Q. Those were the only e-mail
14 addresses that you used during the transaction
15 period?
16 A. Yes.
17 Q. And I just want to clarify, when I
18 say transaction period I'm talking about the
19 transactions between the complainants and the
20 respondents, you know what I'm talking about
21 right the issues that are in the lawsuit?
22 A. No.
23 Q. No what?
24 A. Means I never had any deals with
25 your plaintiff.

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1 SOLOVYEV
2 Q. I understand.
3 So let's clarify because going
4 forward at some point we identify the parties
5 and the characters in this story correctly, so
6 tell me who you thought or who you had dealings
7 with?
8 A. About what?
9 Q. With the transactions at issue,
10 with this issue?
11 A. The boat.
12 Q. The shipping the buys everything?
13 A. Andre Trejaykov, T-R-E-J-A-Y-K-O-V,
14 and the company Middle Asia in Dubai.
15 Q. Is it Middle East Asia Alpha?
16 A. Yes, Middle East Asia Alpha.
17 Q. Have you ever had dealings with Mr.
18 Aleksandr Safonov?
19 MR. CHANG: Are you asking about
20 before this case?
21 MS. TARASSOVA: No, during the
22 transactions. We're trying to identify
23 the people involved in these
24 transactions so that I'm, you know,
25 properly asking the questions and it's

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1 SOLOVYEV
2 not confusing.
3 Q. Mr. Solovyev, have you ever in
4 these transactions dealt with Mr. Safonov?
5 A. Couple of times.
6 Q. Have you ever had dealings with
7 Crocus FZE the Dubai company?
8 A. No, never.
9 Q. Your company's never received any
10 money from Crocus FZE?
11 A. Crocus was sending money as far as
12 I remember from a Miami account. He got
13 offshore in Miami. He was trying to find money
14 in Michigan.
15 Q. So you're saying that any
16 transportations that would have been between
17 your companies and Crocus it would have been
18 the Crocus that's registered in Florida?
19 A. Yes.
20 Q. And had your company's ever issued
21 any invoices to Crocus FZE the Dubai company?
22 A. I don't remember.
23 Q. Is it possible or no?
24 A. I don't remember.
25 Q. What is your highest level of

Page 18

1 SOLOVYEV
2 education?
3 A. College in Moscow Russia.
4 Q. What did you major in?
5 A. Professional musician.
6 Q. Did you attend any colleges or take
7 any college courses in the United States?
8 A. No.
9 Q. Do you hold any degrees?
10 A. No.
11 Q. And do you hold any degrees from
12 Russia?
13 A. Yes.
14 Q. What degree?
15 A. Bachelor degree.
16 Q. Do you hold any professional
17 licenses?
18 A. Where?
19 Q. In the United States.
20 A. No.
21 Q. Do you hold any professional
22 licenses anywhere else in the world?
23 A. No.
24 Q. Are you currently employed?
25 A. Yes.

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1 SOLOVYEV
2 Q. And who are you employed by?
3 A. World Express.
4 Q. And what do you mean World Express
5 in connection?
6 A. It's what I meant.
7 Q. Can you give me the physical
8 address for that business?
9 A. 63 New Hook Road, Bayonne, New
10 Jersey 07002.
11 Q. What state is it incorporated in?
12 A. New Jersey.
13 Q. What year was it incorporated in?
14 A. Around 2007.
15 Q. And does the company hold any
16 licenses?
17 A. No.
18 Q. It does not an FMC license? And I
19 see you looking at your attorney. Are you
20 unable to answer that question?
21 MR. CHANG: If you can answer the
22 question, if you don't know the answer
23 or you don't understand the question --
24 A. No, it's what -- I don't remember.
25 Q. You don't remember if your company

Page 20

1 SOLOVYEV
2 World Express in connection has a license from
3 the Federal Maritime Commission?
4 A. I don't remember. Maybe yes, maybe
5 not.
6 Q. 'Cause I found online that the
7 company actually applied for one in 2009 and
8 was issue an FMC license number?
9 A. If you have it, we can use it.
10 Q. What was that?
11 A. I don't remember because we don't
12 use it for -- since whatever you said, 2009.
13 Q. Can you -- so then can you explain
14 what the business does? What is it in the
15 business of doing World Express in connection?
16 A. Warehousing business.
17 Q. By that, what do you mean
18 specifically?
19 A. Warehousing means warehousing
20 whatever is connected. Cargo into the house
21 and getting out of your houses means their
22 housing business.
23 Q. So you hold goods for who? Do you
24 hold goods for like other businesses?
25 A. For other businesses.

Page 21

1 SOLOVYEV
2 Q. Why did you apply for an FMC
3 license? Were you going to do some shipping
4 internationally?
5 A. I don't remember why.
6 Q. Did you own the business?
7 A. I own the business.
8 Q. Does anyone else own the business
9 with you?
10 A. Maybe, yes.
11 Q. You say maybe. Why maybe?
12 A. Because I don't remember. It
13 was -- it stopped a long time ago. If I
14 know -- I would be prepared, right now I'm not
15 prepared, so, I'm answering maybe.
16 Q. And where would you go to find this
17 information?
18 A. In the World Express files.
19 Q. And where are those files held?
20 A. At the same address what I just
21 remained (sic) to you 63 New Hook Road in our
22 archive specific place where we keep up all the
23 documentation which is required by the
24 government during the last seven years. We
25 call it the archive for World Express.

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1 SOLOVYEV
2 Q. Does World Express have any
3 employees?
4 A. Yes.
5 Q. How many employees does that have?
6 A. Four.
7 Q. And who are those employees?
8 A. Workers, warehouse workers.
9 Q. Can you explain what they do? They
10 all do the same job?
11 A. All they do is the same job.
12 Q. And what is that job?
13 A. Work in the warehouse, unloading,
14 packing and loading cargo.
15 Q. Does anyone work in the office?
16 A. Accounting, accountant one,
17 accountant work in the office.
18 Q. Is that one in addition to the four
19 warehouse workers?
20 A. No, it's including four workers.
21 Q. So you have three warehouse
22 employees and one office employee that's an
23 accountant?
24 A. Yes.
25 Q. And who handles all the paperwork

Page 23

1 SOLOVYEV
2 on behalf of the company; is it your accountant
3 or is it you?
4 A. Me.
5 Q. So are you the one that signs
6 documents on behalf of the company?
7 A. Yes.
8 Q. And are you the one that stores
9 documents in the archives for World Express?
10 A. Yes.
11 Q. Are you employed by any other
12 employer?
13 A. No.
14 Q. What about your company called
15 World Finance Group, LLC?
16 A. It's a self-employee. I'm working
17 as a self-employee.
18 Q. Do you own that company?
19 A. I own this company.
20 Q. What is the address for that
21 company for Royal Finance Group?
22 A. I don't remember. It's a Fort
23 Lauderdale, Miami it's 1040 Seminole Drive.
24 Q. Is that an office building?
25 A. It's a private residence.

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1 SOLOVYEV
2 Q. Whose residence is it?
3 A. I don't remember.
4 Q. Is it your residence?
5 A. It's not my residence. Can I
6 interrupt, please?
7 Q. Sure.
8 (Whereupon, an off-the-record
9 discussion was held.)
10 A. Sorry.
11 MS. TARASSOVA: We are we back on
12 the record.
13 Q. Mr. Solovyev, we were talking about
14 the business address for Royal Finance Group.
15 You were telling me it was a private residence
16 but you don't remember who it belongs to. The
17 last question I asked you was is it your
18 residence?
19 A. No.
20 Q. Is it a family member's residence?
21 A. Yes.
22 Q. Why don't you remember who it
23 belongs to?
24 A. It's not important.
25 Q. Are you just refusing to answer

Page 25

1 SOLOVYEV
2 that question?
3 A. No, it has nothing to do with this
4 your plaintiff about whatever his request is.
5 Q. I don't understand that. I get to
6 ask a wide range of questions. That is
7 something that my client's have a right to do.
8 If your attorney states the question is
9 inappropriate, he may object. At this point
10 your attorney has not objected. I would
11 instruct you to go ahead and answer that
12 question.
13 A. I ask for you clearly what I know.
14 The rest, I don't remember.
15 Q. You have no idea who this private
16 residence belongs to other than it's a family
17 member?
18 A. Yes.
19 Q. Does the business Royal Finance
20 Group have any employees?
21 A. No.
22 Q. Are you an employee of the
23 business?
24 A. Yes.
25 Q. So it has one employee which is

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1 SOLOVYEV
2 you; is that correct?
3 A. Yes.
4 Q. What does Royal Finance Group do?
5 A. Consulting business.
6 Q. What does -- what areas does it
7 consult in?
8 A. International transactions.
9 Q. Can you describe that what you do
10 you go to a different business clients you talk
11 to them about international transactions?
12 A. Yes, one second.
13 MS. TARASSOVA: Okay.
14 (Whereupon, an off-the-record
15 discussion was held.)
16 MS. TARASSOVA: Let the record
17 reflect this is the deponent's second
18 interruption with a phone call. I just
19 want to put that on the record. It's
20 been in the last ten minutes.
21 MR. CHANG: That's fine.
22 Q. You were telling me about the
23 nature of the business. Can you explain what
24 types of clients the business has, the Royal
25 Finance Group?

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1 SOLOVYEV
2 A. International business which
3 required help with buying and selling some
4 merchandise, rules and regulations in the
5 U.S.A. for wholesalers or retailers, support
6 and knowledge of working procedures. It was
7 banks, it was a legal entities with lawyers,
8 and some other stuff.
9 Q. And when did those businesses
10 begin?
11 A. This business began three years
12 ago.
13 Q. And how are you qualified to give
14 such consulting information to clients? Do you
15 have some kind of a specialize knowledge or
16 some kind of experience that would allow you to
17 be able to consult clients on the things you
18 described?
19 A. Yes.
20 Q. Can you explain what that expertise
21 or knowledge is?
22 A. In my experience of 25 years doing
23 international business is worldwide activities.
24 Q. And which companies was that
25 through? I assume they're through your own

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1 SOLOVYEV
2 companies. You tell me what does your 25 years
3 of experience, what does that entail?
4 A. It entails nothing. It just
5 entails that I was logging in international
6 procedure and learning how to do it for many
7 years. It's my own knowledge.
8 Q. Were you employed by some companies
9 in the last 25 years or did you own your own
10 companies?
11 A. No, from the books and internet.
12 Q. You learned from books and internet
13 you said you know you have expertise or
14 knowledge from the last 25 years of doing
15 international business?
16 A. Absolutely right. Doing
17 international business.
18 Q. So how were you doing it? Were you
19 working, were you employed for a company or did
20 you have your own company?
21 A. I had my own companies overseas.
22 Q. Did you -- let's talk about another
23 business that you own currently. Car express
24 and import; do you own that business?
25 A. Yes, I own that business.

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1 SOLOVYEV
2 Q. And what is the address for that
3 business?
4 A. 333 Avenue X, second floor,
5 Brooklyn, New York 11223.
6 Q. Is that an office building?
7 A. It's an office building.
8 Q. What is the phone number for this
9 business?
10 A. 646-725-1335.
11 Q. Is that your cellphone number?
12 A. It's a company number, yeah,
13 company, business number, yeah.
14 Q. Does the business have a fax
15 number?
16 A. No.
17 Q. It does not?
18 A. Does not.
19 Q. Does the business have a website?
20 A. Yes.
21 Q. Is there a fax number listed on
22 that website?
23 A. I don't remember the fax number. I
24 don't remember. I never use a fax.
25 Q. So if there was a fax number listed

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1 SOLOVYEV
2 on the website, you're saying that you would
3 know about it?
4 A. I would know about it.
5 Q. So how do you reconcile the fact
6 that on the website which -- tell me what the
7 website is so that we have that on the record.
8 What is the domain for this business?
9 A. Carexpress@gmail.com.
10 Q. What is the domain address for the
11 website?
12 A. Carexpress.org.
13 Q. What about car express.U.S.?
14 A. It's the same.
15 Q. Are you looking, are you checking
16 that on the phone right now?
17 A. No.
18 Q. Are you texting on the phone right
19 now?
20 A. No.
21 MS. TARASSOVA: Eric?
22 MR. CHANG: Yes.
23 MS. TARASSOVA: I'm going to have
24 to raise an issue here and I want to put
25 that on the record. Mr. Solovyev is

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1 SOLOVYEV
2 very distracted today. He has
3 interrupted the deposition twice to pick
4 up his phone. He's looking at his phone
5 right now, he cannot describe to me what
6 he's doing that is relevant to this
7 deposition. So I'm a little bit
8 concerned about how this is going. Do
9 we need to reschedule this deposition in
10 order for us to have him focused and
11 attentive?
12 MR. CHANG: Do you want this on the
13 record?
14 MS. TARASSOVA: Yeah, I do. I want
15 it on the record as far as what your
16 response is to this?
17 MR. CHANG: Can you continue
18 without your cellphone for the rest of
19 the deposition?
20 THE WITNESS: No, I have to. I
21 have nothing to do. There is no
22 interruptions.
23 MR. CHANG: Can you put it away for
24 the next hour. Can I take the phone for
25 the next hour? Otherwise, we have to

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1 SOLOVYEV
2 reschedule, all right. I'm taking away
3 his with cellphone for now. If we have
4 to reschedule then we'll reschedule
5 let's try to get through this today.
6 MS. TARASSOVA: I agree. Thank you
7 so much.
8 Q. Mr. Solovyev, we're talking about
9 the Car Express website. I see here that it
10 has a website called carexpress.U.S.?
11 A. As well, yes.
12 Q. Is that in addition to
13 carexpress.org that you say?
14 A. Yes, it's in addition.
15 Q. Does Car Express -- where is Car
16 Express an import registered? Which state?
17 A. New York.
18 Q. Does it have any employees?
19 A. No.
20 Q. Are you employed with the company?
21 A. Yes.
22 Q. So it has one employee which is
23 you?
24 A. Yes.
25 Q. Do you own any other companies?

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1 SOLOVYEV
2 A. No.
3 Q. What about Leader Transportation,
4 Inc.?
5 A. What about Leader?
6 Q. Do you own that company?
7 A. Yes, I am.
8 Q. Did you forget that you owned it
9 when I just asked you if you own any other
10 companies?
11 A. I didn't forget about it.
12 Q. So you do own the company?
13 A. I do.
14 Q. What's the business address of that
15 company?
16 A. 63 New Hook Road, New Jersey.
17 Q. What is the phone number for the
18 company?
19 A. 201-858-3785.
20 Q. Where is that company registered?
21 A. New Jersey.
22 Q. Does anyone else own the company
23 besides you?
24 A. No.
25 Q. Does it have employees?

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1 SOLOVYEV
2 A. Yes.
3 Q. How many employees?
4 A. Just one.
5 Q. Is that you?
6 A. Two employees; me and another
7 employee, yeah.
8 Q. And who's the other employee?
9 A. Rami Homeine, R-A-M-I.
10 H-O-M-E-I-N-E.
11 Q. And what does Rami do with the
12 company?
13 A. He's dispatcher of the company.
14 Q. What kind of business is it?
15 A. It's a tracking business.
16 Q. Does the company own its own
17 trucks?
18 A. Several of them, yes.
19 Q. And what does it deliver goods? Is
20 that what it does?
21 A. Yes.
22 Q. And do you use Leader
23 Transportation to deliver like vehicles or
24 vessels for your clients?
25 A. No.

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1 SOLOVYEV
2 Q. What kinds of deliveries does
3 Leader Transportation do?
4 A. Cargo from the warehouse.
5 Q. From which warehouse?
6 A. World Express Warehouse.
7 Q. Are you currently employed by
8 Marine Transport Logistics?
9 A. No.
10 Q. Have you ever been employed?
11 A. No.
12 Q. Do you own it?
13 A. No.
14 Q. Have you ever owned it?
15 A. No.
16 Q. Have you ever owned a company
17 called Mosaic Transportation Lines?
18 A. Yes.
19 Q. And what kind of a company was it?
20 A. It was an NVOCC Company.
21 Q. And what years was it active in?
22 When was it working?
23 A. '93, '97.
24 Q. And how did it close down?
25 A. Just closed down.

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1 SOLOVYEV
2 Q. What was the reason for closing it
3 down?
4 A. I don't remember.
5 Q. Were you the only owner of the
6 business?
7 A. Yes.
8 Q. How many employees did it have?
9 A. I don't remember.
10 Q. Did your wife Allah Solovyev ever
11 participate in that business?
12 A. No.
13 Q. Did you own a business called MTL
14 Worldwide Agency, Inc.?
15 A. I can get your question.
16 Q. Did you own a company called MTL
17 Worldwide Agency, Inc.?
18 A. No.
19 Q. Mr. Solovyev, have you ever filed
20 for bankruptcy?
21 A. Yes.
22 Q. What year was that?
23 A. It was ten years ago.
24 Q. Was it in 2008?
25 A. Around that time.

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1 SOLOVYEV
2 Q. Do you remember submitting
3 information to your attorney in the bankruptcy
4 case about your employment?
5 A. I don't remember.
6 Q. Because if your bankruptcy petition
7 in the schedules attached to it, you report
8 that you were employed by MTL Worldwide Agency?
9 A. So what does it mean?
10 Q. Well, I'm asking you to clarify
11 that. I want to get that information clear.
12 So that if we have to go to trial or a hearing
13 I understand that I'm not mistaken in that
14 information?
15 A. I don't remember.
16 Q. Is it a possibility that you may
17 have owned MTL Worldwide Agency, Inc and worked
18 for it?
19 A. It's a possibility.
20 Q. Do you remember signing a
21 certification in your bankruptcy process that
22 states that your petition is true and accurate?
23 A. Absolutely.
24 Q. Have you ever held yourself out as
25 an agent or a representative for Marine

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1 SOLOVYEV
2 Transport Logistics?
3 A. Yes.
4 Q. In what circumstance did you do
5 that?
6 A. To ship my cars through the money
7 Transport Logistics cars or boats or any
8 commodities which required to be shipped
9 worldwide.
10 Q. And can you explain your
11 understanding of being an agent for MTL?
12 A. Car Express is a wholesale company
13 which was buying cars, boats or any machinery
14 at the USA auto auctions. These requirements
15 to ship it overseas. And the Car Express was
16 using money transport for such purpose.
17 Q. I guess I'm confused. Maybe you
18 can clarify.
19 So you would get a client that --
20 and tell me if I'm wrong but tell me what you
21 understand -- you would get a client through
22 Car Express, they would order something either
23 to buy a used car or used boat or some kind of
24 machinery? Your business would go to the auto
25 auction and purchase those items and then you

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1 SOLOVYEV
2 would use MTL to ship the items to the clients;
3 is that correct?
4 A. It's correct.
5 Q. So how were you an agent for MTL?
6 I don't understand. My understanding is you
7 were just to use MTL for your services or to
8 subcontract the shipping. Did you -- I mean,
9 did your client have an understanding that you
10 were working with MTL or MTL was working for
11 them?
12 A. I didn't get your question. Why is
13 it two different companies? It has to be doing
14 something together when one is a company. It's
15 buying the stuff and another is a shipping --
16 it's two different entities.
17 Q. I understand that. My question is:
18 Why were you an agent for MTL? How does that
19 play in?
20 A. Because I was trying to promote a
21 company, MTL on a friendly basis because this
22 is a very good company for the shipping and if
23 somebody out of business -- but MTL is still in
24 business, so, it's showing the faces -- the
25 company's still doing something right.

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1 SOLOVYEV
2 Q. And so in your e-mails, would you
3 write Aleksandr Solovyev agent for Transport
4 Logistics?
5 A. Yes.
6 Q. Do you know Aleksandr? We talked
7 about Aleksandr Safanov earlier? Do you know
8 him?
9 A. No, I don't know him.
10 Q. And what do you mean you don't know
11 him? Have you ever communicated with him?
12 A. What do you mean? Do I know him?
13 Q. Yes, that's what we have to clarify
14 is I guess -- let's start from the beginning:
15 Have you ever heard about him?
16 A. I heard about him.
17 Q. How did you first hear about him?
18 A. I heard about this person as Andre
19 Trejaykov from Middle East Asia and he present
20 me this person.
21 Q. And how do you know Andre
22 Trejaykov?
23 A. I know from Dubai.
24 Q. How do you know him from Dubai?
25 Did you meet in person one day? Do you have

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1 SOLOVYEV
2 common colleagues or friends?
3 A. I meet him in Dubai one day before.
4 Q. And did you have some kind of a
5 business relationship with Mr. Trejaykov?
6 A. Yes we have business before he
7 present me Safonov. It wasn't the business.
8 It was the same corporation. Trejaykov was
9 buying cars from my Car Express and shipping
10 through MTL in 2013. He brought Safonov into
11 this business.
12 Q. So the first time you heard about
13 Mr. Safonov was in 2013?
14 A. Approximately.
15 Q. What was your understanding about
16 the relationship between Mr. Trejaykov and Mr.
17 Safonov?
18 A. I have no idea. He just brought
19 him. That's all they started to buy boat
20 through Car Express.
21 Q. So when Mr. Trejaykov introduced
22 Mr. Safonov to you, you understood that they
23 were working together?
24 A. Yes.
25 Q. Have you ever met Mr. Safonov in

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1 SOLOVYEV
2 person?
3 A. Once Russia tone, two weeks ago,
4 they brought him for that.
5 MR. CHANG: Louiza, I think the
6 record's getting a little confusing
7 because you're asking him -- I think
8 he's thinking of as of this day have.
9 Q. No, I completely understand what
10 he's saying.
11 A. But we also have to understand what
12 you're asking's a little bit frustrating for
13 everybody here. Be specific, please.
14 MR. CHANG: Let her finish. I know
15 some of the answers in the record were
16 confused. If you're asking questions
17 predating this days, can I ask you to be
18 specific?
19 MS. TARASSOVA: I mean I think I
20 was specific enough. I asked if he ever
21 met him in person. He said, yes, once,
22 two weeks ago. That's pretty clear.
23 MR. CHANG: If that answers your
24 questions.
25 MS. TARASSOVA: Absolutely. I

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1 SOLOVYEV
2 don't see a problem with it whatsoever.
3 Q. Mr. Solovyev, so the first time you
4 ever met Mr. Safonov in person was when --
5 after this lawsuit had been filed and he went
6 to mediation, correct?
7 A. Yes.
8 Q. Prior to this lawsuit, you never
9 met Mr. Safonov in person; is that correct?
10 A. Never.
11 Q. Had you ever communicated with Mr.
12 Safonov prior to the lawsuit?
13 A. Yes.
14 Q. And how did you communicate with
15 him?
16 A. It was some communication in the
17 end of 2013 by Skype and some communication in
18 2014 by e-mails.
19 Q. When we're talking about Skype, did
20 you have a Skype username?
21 A. If I communicate through the Skype,
22 so, I have it.
23 Q. And sometimes the question's seem
24 very like basic but I have to set the record
25 that there was a username and then I will ask

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1 SOLOVYEV
2 you to get specific and tell me what the
3 username is. So I just want to let you know
4 to -- so you did have a username. What was the
5 username for Skype that you used to communicate
6 with Mr. Safonov?
7 A. Aleksandr.Solovyev.
8 Q. What was the e-mail address that
9 you used to communicate with him?
10 A. It was MTLworld@MTLworld.com.
11 Q. Did you purchase the Shopwell in
12 the Monterey for either Mr. Trejaykov or Mr.
13 Safonov or both of them at some point, the two
14 boats that are --
15 A. The boat purchase through any
16 company, Car Express from co-part which
17 litigated in Long Island City.
18 Q. And how were you first contacted
19 about buying these two boats?
20 A. I didn't contact them. They
21 contacted me. They were asking me to help them
22 to buy it.
23 Q. And who specifically reached out to
24 you?
25 A. Andre Trejaykov.

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1 SOLOVYEV
2 Q. And do you remember the date?
3 A. No.
4 Q. What year was that?
5 A. Everything is in the files. I
6 don't remember the date but that was 2013.
7 Q. It was in 2014?
8 A. '13.
9 Q. Who paid for the boats?
10 A. Their side paid for the boat,
11 Middle East Asia.
12 Q. So middle East Asia paid for it?
13 A. Yes.
14 Q. Who did they pay to?
15 A. They paid to Car Express. The
16 hold, they paid to Royal Finance Group.
17 Q. Why did they have to pay to Royal
18 Finance Group?
19 A. Because restrictions of the co-part
20 auto auction regarding the payment obligation
21 was given on a three free-day basis. After
22 that, it's a huge amount of penalty which
23 applies their day which we call in professional
24 way, detention demurrage, D-E-M-U-R-R-A-G-E,
25 and the storage charges and the Royal Finance

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1 SOLOVYEV
2 was helping them to pay in a timely basis for
3 their orders of whatever they bought and pay in
4 time. And after that, was waiting for the
5 payment from overseas, from Middle Asia and
6 usually it was working in time and they've been
7 paying during seven or 10 days.
8 Q. Why did Royal Finance Group do that
9 for them? Does it collect some kind of a fee
10 or interest?
11 A. Yes.
12 Q. What's the fee for the service?
13 A. From \$200 to \$400 per boat. We
14 call it commission.
15 Q. And when they -- when they first
16 reached out to you in this particular
17 transaction, were they going through your
18 company Royal Finance Group to arrange the
19 purchase and shipping or were they going to
20 your company Car Express or World Express who
21 were they contacting to arrange the purchase in
22 the shipment?
23 A. To arrange the purchase of the
24 equipment. We call it equipment. Let's say it
25 the right way. They contacted to Car Express.

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1 SOLOVYEV
2 Q. So you're saying they went directly
3 to Car Express to get the boats and then they
4 went separately? Did they go separately to
5 World Finance Group to finance the purchase?
6 A. They didn't go to Royal Finance.
7 They were receiving invoices from Royal Finance
8 because they couldn't manage their business in
9 a timely basis and I have to find out the way
10 how you excite -- would support them of doing
11 such transactions in the business of buying and
12 shipping to Dubai. So I was helping my friend
13 Andre to establish this business out of U.S.A.
14 using Car Express and Royal Finance.
15 Q. So you were doing it just, you
16 know, as a friendly favor, make sure that they
17 he had the money to pay for the boats at the
18 car auction and basically you were kind of
19 helping him arrange everything through your
20 companies?
21 A. Correct.
22 Q. And then after Royal Finance Group
23 collected the money, did it pay directly to
24 Co-part or did it have to pay Car Express?
25 A. They paid directly to co-part.

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1 SOLOVYEV
2 Q. Who arranged the shipment of the
3 boats to Dubai?
4 A. According to arrangement of the
5 shipping to Dubai customer itself sitting in
6 the Dubai made an arrangement through Car
7 Express and the Car Express is the agent of
8 Money Transport Logistic suggests to the
9 customer in Dubai to go through Money Transport
10 and ship it through Marine Transport.
11 Q. And when you're talking about them
12 going to Car Express which is an agent for MTL,
13 do you mean that they e-mailed you at your
14 address at MTLworld.com; is that how it
15 happened?
16 A. You're talking about what
17 instruction? For the buying, shipping,
18 financing? Which instructions, which
19 investment you're talking right now? (Sic)
20 Q. Arranging the shipment.
21 A. Yes, they were asking mostly
22 verbally to ship it to help them to ship to
23 Dubai and after that, once they're already to
24 ship, they've been in touch with Marine
25 Transport Logistics. They were talking to

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1 SOLOVYEV
2 purchase when the bookings on the timing, on
3 the loading, documentation, mailing back and
4 forth.
5 Q. The reason I ask this question is
6 because all the e-mails from you are from
7 the – that I've seen so far are from
8 MTLworld@MTLworld.com, right where your
9 signature blog says Aleksandr as agent for MTL.
10 What I'm asking you is that how you
11 communicated; through e-mail? Is that the only
12 e-mail you use, whether it was to do your
13 business with Royal Finance Group or do you do
14 your business with Car Express or did you have
15 separate e-mail addresses for Car Express Royal
16 Finance Group?
17 A. Usually I'm doing for every
18 customer a different way of doing business.
19 (Sic) In this case, in your particular case
20 because Safonov didn't speak English and any
21 other language besides Russian and I started
22 this business early – years ago with Andrea.
23 My e-mail MTL@MTLworld.com. I didn't want him
24 to bring in other sources of communication. Do
25 not make his business corporation complicated.

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1 SOLOVYEV
2 So I was trying to setup his transactions
3 through one e-mail which is
4 MTLworld@MTLworld.com.
5 Q. Did you think it was going to be
6 confusing for him to get an e-mail from you
7 from another e-mail address?
8 A. Yes.
9 Q. Does Car Express have its own
10 e-mail address?
11 A. Yes.
12 Q. What is the e-mail address for Car
13 Express?
14 A. I don't remember right now but we
15 have the e-mail – yes, it's on the website.
16 Q. And on the website I see it says
17 info@Carexpress.U.S.?
18 A. Absolutely right.
19 Q. Do you know if the boats ever
20 arrived in Dubai?
21 A. Which boats?
22 Q. The two boats that we were talking
23 about earlier. The Shopwell and the Monterey
24 that you purchased at the auction and set up --
25 set them up with MTL to be shipped?

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1 SOLOVYEV
2 A. Yes, they arrived to Dubai.
3 Q. And how do you know that? How did
4 you get that information?
5 A. We got a bill of lading from Marine
6 Logistics.
7 Q. Why did you receive a bill of
8 lading?
9 A. I didn't receive it. Andre sent it
10 to us.
11 Q. So you received the bill of lading
12 from Andre?
13 A. Yes.
14 Q. That MTL had prepared, correct?
15 A. Yes.
16 Q. Who quoted -- who quoted Andre or
17 Mr. Safonov for the shipping, how much it would
18 cost?
19 A. MTL.
20 Q. Did you participate in quoting them
21 for the shipping at all for these two boats?
22 A. Yes, I helped them to buy trailers,
23 and measure boats with the trailers and to
24 participate in reasonable local shipping of all
25 his boats to Dubai.

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1 SOLOVYEV
2 Q. So had you ever had to contact MTL
3 yourself on their behalf and find out how much
4 it would cost to ship?
5 A. Yes, of course because we have to
6 put together loading and the shipping.
7 Q. Were you getting paid for these
8 services, for arranging everything?
9 A. Who? Me personally?
10 Q. You, yes.
11 A. Personally, not.
12 Q. Any of your companies, were they
13 getting paid for all of this for arranging
14 everything?
15 A. Yes.
16 Q. Which company?
17 A. Royal Finance Group commission for
18 financing, Car Express for commission for the
19 buying boat; some commission was put on top for
20 buying trailers for the customers. And no
21 commission on the shipping with Marine
22 Transport.
23 Q. But did you get any commission or
24 any of your companies for arranging
25 orchestrating. I understand that Royal Finance

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1 SOLOVYEV
2 Group received a commission for its service
3 which is basically floating the purchase and
4 Car Express got a commission for buying but did
5 you or your companies get any commission or
6 payment for going to MTL and measuring these
7 boats and finding out the quotes?
8 A. No, we don't have that in our
9 invoices.
10 Q. Were you just doing that out of the
11 goodness of your heart?
12 A. Yes, I have a big heart, yes.
13 Q. Was MTL paid for its services?
14 A. I didn't get your question. MTL
15 paid nothing for anything. MTL was supposed to
16 be paid for the shipping.
17 Q. Yes, that was my question. Was MTL
18 paid for its services?
19 A. No. MTL didn't pay for anything.
20 MS. TARASSOVA: Ma'am, court
21 reporter, can you repeat my question to
22 the deponent, please.
23 (Whereupon, the referred question
24 was read back by the Reporter.)
25 A. For the shipping, MTL for the

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1 SOLOVYEV
2 shipping to the steamship line, steamship line
3 and the quoted on top, the commission.
4 Q. So MTL was paid a commission for
5 shipping, correct?
6 MR. CHANG: I'm sorry, can you read
7 back his answer. That wasn't his
8 answer.
9 (Whereupon, the referred answer was
10 read back by the Reporter.)
11 Q. Can you clarify that? I think your
12 attorney was confused. I understood your
13 answer as saying that MTL charges a commission
14 for setting up the shipping with vessel?
15 A. Yes, absolutely right, yes.
16 Q. How much was that commission? Do
17 you know?
18 A. No.
19 Q. Did Royal Finance Group receive
20 payment on behalf of MTL?
21 A. Yes.
22 Q. Why did it do that?
23 A. Because it was easy to receive one
24 lump sum from Dubai and Andre was asking to pay
25 once to the company for the all services out of

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1 SOLOVYEV
2 USA and Royal Finances -- Royal Finance Group
3 was receiving money for all services, five, six
4 services and paying on behalf of the customer
5 for all the services up to shipping to the pay
6 Dubai.
7 Q. So Royal Finance Group would
8 receive money on behalf of MTL and then pay MTL
9 its portion for its services?
10 A. Yes.
11 Q. And how does that work? Does Royal
12 Finance Group invoice your clients?
13 A. Yes.
14 Q. Is it invoice based on a quote or a
15 prior agreement?
16 A. On a quote from Marine Transport
17 Logistics.
18 Q. And at some point were these two
19 boats, the month, day and the Shopwell, were
20 they shipped back to New Jersey from Dubai?
21 A. Yes.
22 Q. Why were they shipped back; do you
23 know?
24 A. No.
25 Q. Were you helping with that

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1 SOLOVYEV
2 transaction? Were you helping set up the
3 shipment from Dubai back to New Jersey?
4 A. No.
5 Q. Because I believe I saw some
6 e-mails that Mr. Safonov produced in discovery
7 that showed that you -- I think you forwarded
8 him some communications where you were
9 arranging the shipment and asking for quotes
10 from various companies to ship the two boats
11 from Dubai to New Jersey; do you remember that?
12 A. Yes, they were asking a lot of
13 questions. I was trying to help them to do
14 their business but it's not easier of any
15 company, either companies that you just
16 mentioned been involved in the shipping out of
17 Dubai. They were doing it on their own.
18 Q. And where did those boats end up
19 after they arrived in New Jersey; do you know?
20 A. They end up in the port of New
21 York.
22 Q. And do you know where they went
23 from the port?
24 A. From the port they went to 63 New
25 Hook Road in Bayonne, New Jersey to a warehouse

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1 SOLOVYEV
2 of World Express.
3 Q. How did they end up being stored at
4 World Express?
5 A. They end up as a receiver, final
6 receiver on a bill of lading where it stated
7 that Marine Transport is a notified party for
8 these two boats in U.S.A.
9 Q. Did you help them with that? How
10 did MTL become involved in this?
11 A. MTL was a receiver as an agent for
12 the line. They would receive something from a
13 notified party on a bill of lading and they
14 hire the tracker and unloading department to
15 take this boat out of the container and store
16 it on the World Express yacht.
17 Q. So what I'm trying to understand is
18 your involvement. Prior you had said that you
19 had been helping them deal with MTL, right?
20 Did you have anything to do with the boats back
21 to New Jersey?
22 A. No.
23 Q. Did you help them arrange that?
24 A. No, to New York. No, they did it
25 under their own bill of lading and their own

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1 SOLOVYEV
2 loading and their own decision to ship it back.
3 Q. Do you know why MTL was listed as
4 the final receiver?
5 A. Because like Andre says to me, he
6 don't -- he didn't know anybody in the U.S.A.
7 and he wants to use his boat in U.S.A.
8 Q. And were these boats you said that
9 they were put on a truck and moved to World
10 Express, did they use your company leader?
11 A. I don't know. It looks like not.
12 There was no leader at the time.
13 MR. CHANG: Can you pick a spot for
14 a five-minute break?
15 MS. TARASSOVA: Yes, let's do it
16 now.
17 (Whereupon, a five-minute break was
18 taken.)
19 Q. Mr. Solovyev, we left off on me
20 asking you how the two boats, the Shopwell and
21 the Monterey ended up in storage with World
22 Express in connection; how did that happen?
23 A. Customer from Dubai Andre asked me
24 to install them, ship them and install them in
25 New York.

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1 SOLOVYEV
2 Q. And did you have an agreement about
3 how much that would cost?
4 A. Yes.
5 Q. And was it a written agreement or a
6 verbal agreement?
7 A. It was a Skype communication with
8 numbers which is supposed to indicate the
9 number of the Monterey number for the services.
10 Q. And how much were those services
11 supposed to cost?
12 A. What services?
13 Q. For storage, you said that you guys
14 via Skype that was there was a monetary amount
15 for a monetary number that you discussed for
16 the storage of the two bets with Mr.
17 Trejaykov?
18 A. You're wrong. In order to receive
19 such cargo out of foreign country, you do not
20 have to pay storage accumulating after all
21 other services and charges which occurred
22 before which is included. Custom clearance,
23 port charges, THC, destination, local
24 demurrage, track, unloading and covering and
25 letting of the boats and after that, in about

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1 SOLOVYEV
2 two weeks according to the filing storages
3 accommodated so before storages we have plenty
4 of charges which connected with import
5 shipments of the boat.
6 Q. When you described those charges,
7 can you explain who was responsible for
8 satisfying those charges on the United States
9 side?
10 A. Whoever was a shipper of the
11 anchor, Middle East Asia. They're supposed to
12 be paying all these charges.
13 Q. Did someone pay those charges?
14 A. No.
15 Q. So no one ever paid for customs
16 fees, anything like that?
17 A. Nobody.
18 Q. Do those goods not get held up in
19 customs, if customs had not paid for it?
20 A. No.
21 Q. Can you explain the process to me?
22 How does it work? So say Middle East Asia,
23 sends over the two boats, they don't pay
24 anything to anyone, who takes the hit I mean,
25 do they just have outstanding balances?

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1 SOLOVYEV
2 A. They're supposed to send all
3 balances to the company Marine Transport who
4 was paying for all these charges.
5 Q. So Marine Transport Logistics paid
6 for the charges for Middle East?
7 A. Yes.
8 Q. How does that work? Why would you
9 not collect the fees up front? Why would you
10 invoice afterwards?
11 A. It was invoiced up front.
12 Q. Did they pay?
13 A. It's the same story as procedure of
14 buying equipment from the auctions in order to
15 pay lump sum amount for all services, service
16 has to be provided. As soon as Marine
17 Transport recognizes all the charges for the
18 car and services, invoice was issued and
19 deliver to the customer in full because to
20 predict \$1.00 plus and minus, it's impossible
21 that customs can hold it for any reason. If
22 something come up legal -- but in this case
23 everything was legal -- and all the procedure
24 went smoothly and the boats resolved as a yacht
25 of World Express resolved any additional

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1 SOLOVYEV
2 charges.
3 Q. So was Royal Finance Group involved
4 in this transaction of the boats being shipped
5 back to New Jersey to MTL?
6 A. No.
7 Q. Did Royal Finance Group pay the
8 money upfront to cover customs and shipping
9 charges, Etc.?
10 A. I don't remember. As far as I
11 remember, Marine Transport was paying for all
12 the charges.
13 Q. And to go back to my question
14 before we got into that, I was asking you
15 about -- was there an agreement or an
16 arrangement about the storage fees and you
17 said, well, storage fees are incurred after all
18 of this is paid. Can you please clarify that
19 for me?
20 A. Yes, according to -- we have
21 30 days of fee for the customer who will
22 conduct next step for the business transaction
23 between one of our companies and in resolved
24 reason customer using storage facility as to
25 store and do not ship, do not transact his

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1 SOLOVYEV
2 cargo falls down to the final destination
3 storages will be accommodated according to the
4 filing and any unit or any object which would
5 be stored at the facility of World Express
6 would be penalized with the storage charges.
7 Q. And that policy, is it written
8 somewhere?
9 A. Yes, it's written somewhere.
10 Q. And where is that policy written?
11 A. On the performer of World Express.
12 Q. And would you give that to the
13 compliance? Is it on a website somewhere? Is
14 it an e-mail?
15 A. Yes, it's on the website. Every
16 customer can see it through the website.
17 Q. What is the website?
18 A. MTLworld.com.
19 Q. I'm confused and I hear your
20 attorney is confused as well.
21 So I'm talking about storage with
22 World Express?
23 A. Sorry. It's my mistaken. On the
24 inspection report, yes, you're right. On the
25 inspection report of World Express, there is a

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1 SOLOVYEV
2 stipulation on the backside. Absolutely on the
3 bill of lading stipulation of the storage
4 charges, yes, Marine Transport has nothing to
5 do with it on the World Express policy. Its
6 inspection report is stipulated as a bill of
7 lading at the backside of this paper, it
8 stipulated the storage charges procedure.
9 Absolutely right, you're right.
10 Q. Do you have a record of giving that
11 of that document from World Express where the
12 policy is written on the back of the bill of
13 lading? Do you have a copy of that that we can
14 see?
15 A. Yeah, you can see it.
16 Q. But you have it?
17 A. I can have a copy in my office in
18 the office of World Express. You can see it
19 was mentioned to Andre Trejaykov about this
20 policy he decided to ship it back or when I
21 decided to ship it to Dubai, it was stated to
22 him verbally. He doesn't speak English. So it
23 was verbally and stipulated to him that he
24 would be responsible for the storage.
25 Q. And on that written document, does

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1 SOLOVYEV
2 he have to sign the bill of lading at any
3 point? You're saying it's on the back of the
4 bill of lading, that policy?
5 A. Yes, it's on the back, yes.
6 Q. Did Mr. Andre Trejaykov or Mr.
7 Safonov or anyone else, did they ever have to
8 sign that document?
9 A. Don't have to.
10 Q. So did they come in contact with
11 that document in the regular course of
12 business?
13 A. No.
14 Q. So how would they be on notice that
15 that policy's on the back of the bill of
16 lading?
17 A. There was no notice. They would
18 ask me if there was any storage. I show them
19 the paperwork. It's my translation. It's my
20 full translation from English to Russian that
21 they would be in charge for the storage such
22 and such numbers to the -- according to the
23 size of their boat.
24 Q. So basically you're saying that it
25 was on a piece of paper that they didn't sign

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1 SOLOVYEV
2 and you verbally explained it to them?
3 A. Yes, every customer -- there is
4 thousands and thousands of customers coming
5 through World Express knows about this
6 procedure. Thousands and thousands and during
7 last 20 years. It was the same procedure for
8 every customer. Maybe medium people know this
9 procedure. If you ask anybody about this
10 procedure, everybody knows it. The storage
11 charges will apply if the customer does not
12 ship. It just wants to store it.
13 Q. It's like a regular course of
14 business activity for the --
15 A. It's a regulation of the business,
16 yes.
17 Q. And so if they don't pick up their,
18 you know, goods in 30 days, what are the
19 storage fees?
20 A. It's according to the measurement
21 of let's say for the cars. We got from \$10 up
22 to \$15 per day and for the boat it's from liner
23 meter. It's like \$20. I don't remember how
24 much. It's \$20 per liner meter so it's like if
25 the boat -- let's say for the small boat, let's

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1 SOLOVYEV
2 say it's about \$40 a day for the large boat
3 it's maybe from \$100 up to \$150 a day.
4 Q. Is that the industry rate or is
5 that something that you assign as a company?
6 A. Industry rate is three times higher
7 than I just mentioned to you.
8 Q. How long were the monitoring and
9 the Shopwell at World Express?
10 A. Very long years and years. More
11 than a year.
12 Q. More than a year.
13 Did you at any point notify either
14 Mr. Trejaykov or Mr. Safonov that their boats
15 are going to be incurring storage fees?
16 A. Absolutely.
17 Q. How did you notify them?
18 A. In writing.
19 Q. Through what medium?
20 A. Through the internet, Skype.
21 Q. So you wrote them a message through
22 Skype?
23 A. Absolutely.
24 Q. And when did you first inform them
25 about the storage fees?

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1 SOLOVYEV
2 A. When I understood that they were
3 hiding from me and they have some kind of
4 problems speaking them up (sic) and their
5 boats, their boat on top of my neck and they
6 just -- keeping the space which is supposed to
7 be for the business purpose, not for the
8 storage.
9 Q. What is your procedure to notify
10 clients if it's past 30 days? Do you reach out
11 to them immediately after the 30 days is up or
12 do you wait for them to contact you and just
13 passively add to their balance with the
14 company? What's your procedure?
15 A. It's a different procedure.
16 Usually if the customer is shipping with us,
17 and he's asking to store it, it's over the
18 phone or by e-mail. It's always -- it's a
19 different procedure. It depends on what kind
20 of customer how we ask him. We can talk
21 verbally. If you do not trust the customer, we
22 can send them an official letter or lawyer sign
23 or through the court order.
24 Q. And in this case with the two
25 boats, the Shopwell and the monitor ray, did



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1 SOLOVYEV
2 you trust Andre Trejaykov and Aleksandr
3 Safonov; did you trust them?
4 A. Absolutely, yes.
5 Q. So what happened when you noticed
6 that 30 days went by, the boats are sitting on
7 your lot and they're not picking them up? Did
8 you notify them?
9 A. Yes, we notify them. Not after
10 three days, maybe a couple of months because
11 they -- it was having a problem during the
12 period of time, 2014 to bring them out. It was
13 a lot of snow and they said give us months or
14 two, we'll take care of it and snow. It's
15 just -- and then after that, it was spring and
16 the summer and, you know, we didn't what to do
17 with these boats. After that we started
18 sending them messages.
19 Q. And when you're talking about snow
20 do you mean snow? New Jersey on your end?
21 A. Yes, snow in New Jersey. It was a
22 lot of snow. They couldn't handle these boats
23 calling me several times keep these boats to
24 pay for the storages.
25 Q. Why would they have a problem with

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1 SOLOVYEV
2 the snow? Is it because you charged them more
3 to get them out? Why would they care, it's not
4 their problem?
5 A. I didn't charge them more because
6 to keep out and move boats in such snow, it's
7 very difficult. Nobody any tracking company
8 would do it. I remember it was a lot of snow
9 during this time, yes. I don't know, maybe
10 there was their reason. I don't know why.
11 It's my suggestion but we've been talking about
12 weather, conditions of the weather during this
13 time and they knew the condition it was in.
14 Maybe it was interruption of the next step to
15 continue business here.
16 Q. And then when the snow cleared, did
17 you contact them again and let them know that
18 they are incurring fees?
19 A. Yes.
20 Q. How did you contact them the second
21 time?
22 A. Over the phone, over e-mail.
23 Q. Do you have proof? Do you have an
24 e-mail retained from that when you gave them
25 notice?

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1 SOLOVYEV
2 A. Yes.
3 Q. And what is that -- do you know
4 what the date of that e-mail is?
5 A. No. As far as I remember, it was
6 in May 2014 with several messages by Skype in
7 about -- in April time.
8 Q. April 2014?
9 A. Yes.
10 Q. And do you have those records?
11 A. Yes, we have it, yeah.
12 Q. And the first thing that you
13 notified them, it was wintertime. Did you do
14 it by phone or e-mail and Skype?
15 A. By phone for sure. They knew that
16 was going on and if the ship it -- hold on.
17 Can you give me a second?
18 MS. TARASSOVA: Sure.
19 (Whereupon, an off-the-record
20 discussion was held.)
21 Q. Let the record reflect that Mr.
22 Solovyev is double checking on his computer.
23 And Mr. Solovyev, can you just let us know what
24 you're referring to right now? What you're
25 looking at?

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1 SOLOVYEV
2 A. I was trying to remember when the
3 boats came back.
4 Q. What are you looking at? What are
5 you referring to on your computer? What
6 document?
7 A. Bill of lading for these two boats
8 arrive back.
9 Q. And what was the day on the bill of
10 lading?
11 A. It was August, September 2014 when
12 they came back.
13 Q. You said when? What was the date?
14 A. 2014 in the middle of the year two
15 boats arrived there.
16 Q. Do you have the date or you just
17 know that it's was summertime?
18 A. Let me find --
19 Q. Can you let me know what you're
20 looking at there? What are you referring to?
21 What document is helping you remember?
22 A. You're asking me about these two
23 boats. When they arrived with the dates and
24 I'm trying to find the exact date when they
25 arrived here in New York out of Dubai all

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1 SOLOVYEV
2 right.
3 Q. Yep. What document are you
4 referring to on your computer?
5 A. Bill of lading which was sent to me
6 from Andre Trejaykov under his booking for
7 these two boats. I'm looking for the bill of
8 lading.
9 Q. Okay.
10 A. Yes, on August 2014, yes.
11 Q. So in the winter of 2014 they were
12 not in New Jersey. They were in Dubai, right?
13 A. Yes.
14 Q. So can you clarify that; cause you
15 said you remember there was a storm that
16 prevented them from getting picked up. When
17 was that. Is this even in reference to these
18 boats or might it have been something else?
19 A. It's in reference to Formula,
20 another boat.
21 Q. And when was the Formula purchased?
22 A. In August 2013.
23 Q. So it stayed and where was it
24 stored, with what company?
25 A. World Express.

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1 SOLOVYEV
2 Q. What company bought it?
3 A. Car Express.
4 Q. Was the purchase through co-part as
5 well?
6 A. The same through co-part.
7 Q. And did Royal Finance Group collect
8 money for all the services that your company's
9 provided?
10 A. Yes.
11 Q. And in relation to the transaction
12 with the Formula, how did you communicate? Who
13 did you communicate with?
14 A. Andre Trejaykov.
15 Q. And how did you communicate with
16 him; through Skype, e-mail, phone?
17 A. E-mail, Skype and phone.
18 Q. And did you use that e-mail called
19 our e-mail MTLworld@MTLworld.com?
20 A. Yes.
21 Q. So that was -- was that the boat
22 that was being stored through the wintertime
23 and you had issues with the snow?
24 A. Yes.
25 Q. So let's get this clear because --

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1 SOLOVYEV
2 see now I'm confused.
3 As far as the notices, I want to
4 talk about, the notices that your company or
5 you gave to them are about storage fees. In
6 relation to the Monterey and the Shopwell, when
7 was the first time that you gave either Mr.
8 Trejaykov or Mr. Safonov notice that they are
9 incurring storage charges?
10 A. Immediately after their arrival to
11 New York back. They knew about storage charges
12 immediately.
13 Q. How did they know about them?
14 A. Because they were asking if any
15 storages occurred and they received a positive
16 answer yes would be storages if they occur.
17 Q. Was this -- did they ask in writing
18 and did you respond in writing or was this all
19 verbal?
20 A. It was verbal and as far as I
21 remember, in writing definitely it was in
22 writing.
23 Q. Do you have evidence of that? Can
24 you go to an e-mail or Skype message and pull
25 that up right now?

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1 SOLOVYEV
2 A. Not right now. My lawyer also has
3 this information for you.
4 Q. He already has the information for
5 us?
6 A. Yes.
7 Q. And when you're talking about
8 writing what would you look in? Would you look
9 into your Skype account or would you look into
10 your e-mail account or both?
11 A. Both.
12 Q. So if they arrived in August 2014
13 at what point did they begin incurring storage
14 fees?
15 A. Right in the month after arrival.
16 Q. Within 30 days?
17 A. Within 30 days, yes.
18 Q. And when was that the first written
19 notice given? Do you know the date of that?
20 A. I don't remember the date but it
21 was given, notice was given.
22 Q. And we're talking about written
23 notice?
24 A. Written notice, yes.
25 Q. How many -- did you remind them

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1 SOLOVYEV
2 again? Did you give them additional notices or
3 it was just that one time?
4 A. It was mentioned on every
5 conversation over Skype to Andre Trejaykov.
6 Q. Did you ever send an official
7 invoice to Andre or Mr. Safonov?
8 A. Yes, it was an official invoice,
9 yes.
10 Q. And when was that invoice sent?
11 A. Official invoice was September,
12 within a couple of months after boats arrived.
13 Q. And how much was that invoice for?
14 A. It was particularly for the storage
15 charges which is occurred up to storage day,
16 particular storage day. It was several
17 invoices which was issued from the beginning
18 after that bill had been adjusted to the higher
19 amount and never applied to other invoices and
20 nothing replied from any of the customers.
21 What you just mentioned, Andre Trejaykov or
22 Aleksandr Safonov, on the storage charges when
23 they're planning to pay or any other movements
24 of the boats.
25 For the proposal, for helping them

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1 SOLOVYEV
2 to ship it from Dubai or to fly never got to
3 this point during the next two years on any of
4 my question. So according to the New Jersey
5 law, and we have this law stipulated by
6 governor of New Jersey, we have three months of
7 storage free. After that we can get rid of the
8 boats, sell them, give us the rights on our
9 side, you can do it as well but we didn't do
10 it. We were trusted in believing that these
11 people would be -- would resolve this issue of
12 storage on their own.
13 Q. So is it my understanding and tell
14 me where I'm incorrect in the record, my
15 understanding from Mr. Safonov is that the
16 first time he heard about any storage fees was
17 when he received an invoice for about \$40,000;
18 was that the only invoice that you had sent or
19 were there invoices prior to that?
20 A. Let me explain to you how it works.
21 If you bring your car, I can give you an
22 example to a repair shop and you don't pick it
23 up after the day of your car was repaired in
24 every way in U.S.A. they will charge you and
25 everybody has the same stipulation, every car

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1 SOLOVYEV
2 shop has a stipulation, they're going to charge
3 you \$45 for storage car or \$60 per day and if
4 its amount exceeds such particular amount,
5 let's say \$2,000, they needed to put a lien or
6 just bring it to the auction and resell to get
7 their money back for the storage. The same
8 storage procedure supposed to be in this case
9 with World Express which stipulated on World
10 Express bill of lading, okay but because it was
11 my friends, we didn't put a lien and we didn't
12 sell them to cover our expenses to store them
13 for our own money. And if the customer who are
14 using somebody services in U.S.A. not
15 responsible for their boats, let's say in this
16 situation, so it's his fault to be punished
17 according to the New Jersey law for storages or
18 resending his entity in order to cover the
19 storage charges which accumulated because of
20 his mistake, not calculation for -- not to be
21 responsible for his own boat.
22 MR. CHANG: Note my objection
23 that's not responsive to the question.
24 Q. Had you ever charged them -- when I
25 say you, I guess I'm talking about World

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1 SOLOVYEV
2 Express in connection, right because that would
3 be the entity that's charging them for storage;
4 is that correct?
5 A. Correct.
6 Q. Had you ever charged them storage
7 fees before? First of all, let me back up so
8 we can set the record straight. Had you done
9 business with Mr. Trejaykov or Mr. Safonov
10 prior to these three boats?
11 A. Yes, I did business with Mr.
12 Trejaykov before Safonov for about two years
13 before.
14 Q. And had you ever had charged Mr.
15 Trejaykov any storage fees?
16 A. No, there was no storage fees
17 because he was shipping everything in time out
18 of U.S.A. If he spent his money, he's supposed
19 to get his goods in Dubai as soon as possible.
20 He had never get in storage.
21 Q. So this was the first time that you
22 had to enforce your storage fee policy?
23 A. Absolutely. It was the first time
24 and customer had not been responsible for his
25 own goods.



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1 SOLOVYEV
2 Q. So what I'm getting at is this,
3 what I'm trying to figure out right now usually
4 when a business sees that their client who's
5 been doing well and has been honest through
6 their course of dealings is not picking up the
7 boats is not responding now they're an
8 inconvenience to you as a business, right?
9 A. Right.
10 Q. Usually the business will give
11 notice to that person or that company. So say,
12 listen you are now incurring storage fees
13 because you are not picking up your boats,
14 you're being nonresponsive or unresponsive. So
15 you're saying you did that and I'm trying to
16 figure out because at this point I have not
17 seen any documentation other than the e-mail
18 where you sent the \$40,000 invoice at, what
19 point did you give them notice in writing that
20 they will start incurring storages?
21 A. It was a notice over the phone and
22 Skype conversation between me and Andre which I
23 present to my lawyer where Andre says that
24 Aleksandr Safonov called him recently asking
25 why he is getting storage charges for his boat.

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1 SOLOVYEV
2 I got this information over Skype and if
3 Safonov is saying that he never received it, he
4 received it, I got proof.
5 MS. TARASSOVA: And counsel, do you
6 know what your client is talking about
7 because I have not seen those Skype
8 conversations?
9 MR. CHANG: I'm not positive. It
10 sounds like he's talking about a Skype
11 conversation after the invoice was sent;
12 is that correct?
13 A. Sure.
14 MR. CHANG: Does that answer your
15 question?
16 MS. TARASSOVA: Okay.
17 Q. So this Skype conversation after
18 the \$40,000 invoice; is that right?
19 A. Yes, absolutely right.
20 Q. So tell me if I'm wrong but the
21 first time that Mr. Safonov or Mr. Trejaykov
22 got notice in writing or an official invoice,
23 that was the e-mail that had the invoice for
24 \$40,000; is that correct?
25 A. Yes, whatever it was. It was

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1 SOLOVYEV
2 first.
3 MR. CHANG: Objection to form.
4 MR. TARASSOVA: And then the
5 question to Eric is, Eric, do you know
6 what Skype conversation he's talking
7 about because I haven't received that?
8 MR. CHANG: I do not but obviously
9 if you make the request for it, we'll
10 dig it up and turn it over.
11 A. I'll mark it up.
12 MR. CHANG: We'll find it just so
13 the record's clear post August 2014?
14 MS. TARASSOVA: What are you
15 talking about?
16 MR. CHANG: Are you asking about
17 post August 2014?
18 MS. TARASSOVA: No, I'm talking
19 about -- your client told you that he
20 submitted as a disclosure that I haven't
21 received -- I'm talking about everything
22 your client submitted. It's not post or
23 prior, it's everything that may be in
24 your possession that is supposed to be
25 disclosed.

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1 SOLOVYEV
2 MR. CHANG: Okay. I will look
3 through our files and see what we have
4 responsive your demand.
5 MS. TARASSOVA: Okay.
6 Q. So now the invoice, who did you
7 send that invoice, the \$43,000? Let me look --
8 MS. TARASSOVA: Let me look for
9 something. Off the record.
10 (Whereupon, an off-the-record
11 discussion was held.)
12 Q. I found the invoice and it is dated
13 August 13th, 2014, it is from Royal Finance
14 Group, Inc. to Crocus Investments for storage
15 of the \$2,010 Formula at \$9.60 for one linear
16 meter per day. And unloading from the trailer
17 and that is in the amount of \$39,409.39. Is
18 that the invoice that you were talking about?
19 A. Yes.
20 Q. Now, this invoice looks like it was
21 just made out for the storage of the formula.
22 What about the other two boats the Monterey and
23 the Shopwell had just arrived to New Jersey
24 that summer?
25 A. Yes.

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1 SOLOVYEV
2 Q. So when this invoice came out for
3 the storage of the formula, would an invoice
4 have been due for the storage of the Shopwell
5 and the Monterey at that point in August 2014?
6 A. It was an additional invoice
7 separated from formula.
8 Q. And when did that invoice go out
9 for the monitor ray and the Shopwell?
10 A. As soon as these two boats arrived
11 back from Dubai.
12 Q. Now, this invoice for the formula,
13 who did you send that invoice to?
14 A. It was sent to Crocus and Andre
15 Trejaykov.
16 Q. To both, so they were sent -- were
17 they sent to Mr. Safonov on behalf of Crocus?
18 A. Yes.
19 Q. Why did you wait so long to issue
20 the bill for the formula?
21 A. I didn't wait. They were waiting.
22 I didn't wait.
23 Q. Because the invoice is issued about
24 a year after it had been purchased in standing
25 at World Express in connection. It was bought

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1 SOLOVYEV
2 in the summer of 2013 and the invoice is issued
3 in the summer of 2014; is that correct?
4 A. No.
5 Q. When was the formula purchased?
6 A. Purchased in about
7 August/September 2013.
8 Q. So this invoice for \$39,000 was
9 issued in August 2014?
10 A. So what?
11 Q. What I'm asking is: Why did you
12 wait one year to issue the invoice?
13 A. I didn't wait. Customer was
14 waiting for his decision, what to do with the
15 boats. I didn't wait. As soon as the boat was
16 on my way the invoice but it was the decision
17 of the customer how soon to get this invoice
18 and what to do with the boat. We have nothing
19 to do with his boat. It's a customer who was
20 waiting whoever they didn't know what to do
21 with his boat.
22 Q. Right, but aren't you concerned
23 like any other business would be if you're
24 providing a service for a long time and the
25 clients is incurring a lot of fees that they

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1 SOLOVYEV
2 may not pay the large fee?
3 A. No.
4 Q. Isn't that a risk for your
5 business?
6 A. It's a very big risk for the
7 business what I did to my friends so much time
8 to think about it. As they didn't make up
9 their minds, they didn't make a final decision
10 but they've been in touch with me constantly
11 about this boat opportunity to bring it to
12 Florida or to Dubai. They were talking to me.
13 Q. What prompted you to finally issue
14 the invoice for \$39,000 for formula for the
15 storage of the formula?
16 A. Say it again.
17 Q. What made you finally issue the
18 invoice because you said you were waiting on
19 them to figure out what they were going to do
20 finally in August? You decided to send them
21 the invoice. What event prompted you to send
22 that invoice?
23 A. Because people steal. They know
24 what to do with this boat even after seeing
25 some proposals from my side to shipping to ship

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1 SOLOVYEV
2 them to Dubai or to bring them back to Florida
3 they didn't react to any of my proposals and I
4 was frustrated keeping the cargo at our
5 facility for nothing.
6 Q. Do you know what their current
7 balance with World Express in connection is to
8 date for storage?
9 A. More than a hundred thousand
10 dollars.
11 Q. Can you tell me about the business
12 relationship that you had with Mr. Trejaykov
13 and Mr. Safonov as far as you and your company,
14 shipping cars to Dubai to repair and resell;
15 what is that about?
16 A. They were buying the cars, bots,
17 jet ski, some parts, auto parts, boat parts out
18 of U.S.A. and I was helping them to buy those
19 units or cargo or commodities and usually we
20 ship them to Dubai during all this time
21 calculating fees, that's all.
22 Q. What was your agreement? Was it
23 for you to make some money off of the profit
24 and/or were you just purely providing the cars
25 for them for a commission?



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1 SOLOVYEV
2 A. No, usually they were buying cars
3 or boats or parts on their own money. Do not
4 ask me about whatever I would be participating
5 as a business. I never participate in their
6 business.
7 Q. Because I have an e-mail which we
8 provided to you that is between you and Mr.
9 Safonov in December 2013 talking about a
10 Mercedes Benz SL and a Porsche that you had
11 shipped over to Dubai. What's the deal of
12 that? What was the understanding?
13 A. It was customer who was shipping
14 panorama and a Mercedes. It's salvage cars
15 which Andre Trejaykov was supposed to sell it
16 in Dubai. Make his commission and return money
17 back to let's say United States, that's all.
18 Q. But do you buy the cars for them
19 and did you charge them for them?
20 A. No, it's not the business. It was
21 a business for one of the customers in U.S.A.
22 which ask me to sell them in Dubai, that's all.
23 Q. I guess what I'm getting at is, you
24 know, my clients are saying that they had a
25 business relationship with you where they would

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1 SOLOVYEV
2 hold your vehicles that you sent over to Dubai
3 to resell just like you held their boats in New
4 Jersey. It was a mutual relationship in,
5 therefore, storage fees wouldn't be due because
6 their storage of your vehicles equal the
7 storage of the boats; is that incorrect?
8 What's your response on that issue?
9 A. I have no idea what you are talking
10 about.
11 Q. You never heard about, you know,
12 them claiming that they had stored cars for you
13 in Dubai?
14 A. No.
15 Q. So would you say your business
16 relationship with them was purely you
17 purchasing items on the auction and then taking
18 a commission and arranging shipment to Dubai?
19 Was that strictly contained to that?
20 A. Absolutely.
21 Q. Now, I asked you earlier if you
22 were at all in any way employed or owned part
23 of Marine Transport Logistics and you said, no;
24 is that correct?
25 A. Yes.

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1 SOLOVYEV
2 Q. Have you -- you said that you were
3 sued prior? How many times would you say you
4 were sued?
5 MR. CHANG: Object to the form
6 but --
7 A. I don't understand your question.
8 Q. How many times have you been sued
9 as Aleksandr Solovyev but how many times have
10 you been named as a party in the lawsuit?
11 A. Just once.
12 Q. I found a couple of lawsuits that
13 named you as a party and I want to go over them
14 with you to see if you remember that.
15 In 20 -- in 1997 you were sued?
16 You were named as a party along with a company
17 named Mosaic Transportation Lines, the
18 plaintiff in that case was Hockeye. Do you
19 remember that lawsuit?
20 A. No.
21 Q. In 2005, you were named as an
22 individual in a lawsuit along with MTL
23 Worldwide Agency, Inc. in a lawsuit where the
24 plaintiff was American president lines; do you
25 remember that lawsuit?

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1 SOLOVYEV
2 A. Yes.
3 Q. What was that about?
4 MR. CHANG: I'm going to object to
5 that line of questioning. I'm going to
6 instruct him not to answer unless you
7 can tie up some relevance to these
8 lawsuits.
9 MS. TARASSOVA: No, I don't think
10 that's how objections work, unless it's
11 privileged. You can't instruct him not
12 to answer the question. You can object
13 to form and you can object to it not
14 leading to any discoverable evidence but
15 we can deal with that in court. Are you
16 instructing him not to answer based on
17 privilege?
18 MR. CHANG: What was your question?
19 What was the lawsuit about?
20 MS. TARASSOVA: Right, correct.
21 MR. CHANG: If you remember, answer
22 the question.
23 Q. Go ahead Mr. Solovyev.
24 A. We had six containers with
25 windshield washer shipped no, no, no. Which

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1 SOLOVYEV
2 company was it?
3 Q. American President Lines, LTD 2005?
4 A. What was it about?
5 Q. That's what I'm asking you?
6 A. No, I don't remember. Then I don't
7 remember if you just asking -- you don't know
8 what you're asking about. I don't remember.
9 Q. No, I'm asking you about a lawsuit
10 that you were named as a party and you said you
11 do remember that lawsuit and you were about to
12 tell me what it is about?
13 A. No, you tell me what it is about
14 and I tell you in details because I don't
15 remember like from this guy what happened ten
16 years ago.
17 Q. Let's talk about more recent cases
18 that you may remember in 2009. You were named
19 as a party in a lawsuit along with Marine
20 Transport Logistics and your wife and World
21 Express it was a labor and employment lawsuit.
22 You were sued by Nadia, N-A-D-I-A, Fursoff,
23 F-U-R-S-O-F-F; do you remember that?
24 A. Yes, I remember.
25 Q. Do you remember in that lawsuit her

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1 SOLOVYEV
2 alleging that you had control over MTL and she
3 had actually been employed by both companies
4 MTL and World Express in connection at the same
5 time?
6 A. It's maybe it. I don't remember
7 details but maybe.
8 Q. Why would she say that you had
9 control over MTL and were responsible for
10 hiring and firing employees for MTL?
11 MR. CHANG: Note my objection. I
12 am instructing him not to answer this
13 one.
14 MS. TARASSOVA: Based on privilege?
15 MR. CHANG: Privilege and
16 attorney/client. You're asking him to
17 speculate the offenses. The plaintiff
18 may have alleged.
19 MS. TARASSOVA: Absolutely not.
20 MR. CHANG: Why would the plaintiff
21 against him have alleged so and so cause
22 of action?
23 MS. TARASSOVA: Right.
24 MR. CHANG: I'm instructing him not
25 to answer.

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1 SOLOVYEV
2 MS. TARASSOVA: Not a cause of
3 action. It's not a cause of action
4 because the cause of action was a labor
5 and employment issue. What I'm asking
6 is why would she allege the fact?
7 MR. CHANG: You're asking him to
8 speculate as to why a plaintiff alleged
9 so and so cause of action? That's not
10 what he's here for. That's not even a
11 question he can answer.
12 MS. TARASSOVA: He can answer that
13 question. This isn't court so
14 speculation would not be an objection.
15 You can use that later. I'm asking why
16 would she allege that fact? We can go
17 into that. This is very relevant, Eric.
18 Mr. Solovyev was saying on the record
19 that he has nothing to do with MTL. I'm
20 talking about examples of other people
21 stating that in fact he does have
22 control over it so --
23 MR. CHANG: That's not a question
24 that Mr. Solovyev has any capability of
25 answering. Again, you're asking him to

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1 SOLOVYEV
2 speculate what a third party is thinking
3 or might have done.
4 MS. TARASSOVA: That's fine. He
5 can answer in any way that he wants to
6 answer that but I want him to answer the
7 question. You know I don't think you
8 can jump in and fight his fight for him.
9 It's a question that he has to answer
10 the best way he can. It's a deposition.
11 MR. CHANG: Okay, if you can answer
12 the question.
13 A. Yes, I can answer. I remember
14 Nadia Fursoff she was the biggest liar which
15 I've seen in my life. She was stealing money
16 of doing her duties in the company World
17 Express. It was a big fuss when she had an
18 agreement. She got the cleaning activity
19 between her working as a dispatcher for the
20 company and a subcontracting company whom she
21 hired and she was watching the money and
22 presenting false invoices to the company,
23 buying cheap and they're it sending to MTL or
24 MCL services much more higher than it's
25 supposed to be. I think she's a big liar.

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1 SOLOVYEV
2 Whatever you got information right now about
3 this case, you couldn't get me convinced that I
4 was doing something wrong. I know this person
5 is a big, big liar and she has a criminal
6 record. She was a lap dancer before, she was a
7 prostitute before and it was huge history of
8 this person. So it's not resolved of what you
9 can get truthful information about what's going
10 on in the companies.
11 Q. What position did she serve with
12 World Express in connection?
13 A. She was handling some deliveries
14 some warehousing drop.
15 Q. At the time that she was an
16 employee for World Express In Connection, was
17 she an employee with MTL as well at the same
18 time?
19 A. I don't remember.
20 Q. Then, again, in 2013 you had a
21 similar lawsuit where an employee named Kirill,
22 K-I-R-I-L-L, Delendra, D-E-L-E-N-D-R-A. He
23 alleged basically the same thing that Nadia did
24 that you are in charge of both MTL and World
25 Express In Connection that he had worked for

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1 SOLOVYEV
2 both of the companies simultaneously and that
3 you were responsible for hiring and firing for
4 both companies. Same question: Why would he
5 allege that fact in the 2013 case?
6 MR. CHANG: None of your questions
7 are factual questions. Every one of
8 your questions you're asking him why a
9 plaintiff might have sued him but that's
10 a question.
11 MS. TARASSOVA: No.
12 MR. CHANG: If you have a factual
13 question that you can answer ask him,
14 otherwise I'm instructing him not to
15 answer. If you want to make a motion to
16 get an answer for this go ahead but --
17 MS. TARASSOVA: I want to put on
18 the record that the question did not go
19 to why the plaintiff sued him or what
20 his theory of liability was. My
21 question --
22 MR. CHANG: Can I have the reporter
23 read back the question?
24 (Whereupon, the referred question
25 was read back by the Reporter.)

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1 SOLOVYEV
2 MR. CHANG: That's the exact
3 question you were asking. Why is this
4 guy alleging these facts.
5 MS. TARASSOVA: Correct. It's not
6 why is he bringing the lawsuit for, you
7 know, unpaid wages, the question is why
8 is he alleging that fact. It's a fact
9 question.
10 MR. CHANG: It's not a fact
11 question within Mr. Solovyev's
12 knowledge. Why would a plaintiff bring
13 such a lawsuit, what facts does the
14 plaintiff brings?
15 MS. TARASSOVA: I think you're
16 answering on behalf of Mr. Solovyev but
17 I have not heard Mr. Solovyev say that
18 he doesn't know. So I would propose
19 that Mr. Solovyev answer that question
20 to the best of his ability. I would
21 raise the same issue as the 2009 case
22 that you made the same argument. I said
23 stop fighting, stop answering the
24 questions for him. There's no legal
25 grounds why he should not respond to

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1 SOLOVYEV
2 this question. It's not privileged. I
3 just asked him why would this person
4 state the same fact.
5 MR. CHANG: Why would someone who's
6 not Mr. Solovyev state these facts?
7 MS. TARASSOVA: Correct.
8 MR. CHANG: That's your question?
9 MS. TARASSOVA: That's my question.
10 MR. CHANG: If you can answer, why
11 the plaintiff in the 2013-case --
12 A. I can explain. I have nothing
13 against this question. This person Kirill was
14 working as a loader in our warehouse, whatever
15 he say. He said nothing. His lawyer said the
16 same way like you are asking on behalf of your
17 customers, and we know how lawyers are working
18 this case, they are trying to find somebody who
19 pays money to his customers. So the same with
20 Kirill. When he punched me with a nail gun,
21 ear gun, he did it himself. Nobody discharge
22 this person at the time of his labor. And
23 after that, the lawyer went for everybody who
24 was in the same building, every company, he
25 started to swear at everybody. That's all what

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1 SOLOVYEV
2 happened, but he was working to the World
3 Express just loading cars, that's all.
4 Q. In 2013, there was a case against
5 you as an individual as well as MTL Royal
6 Finance Group, Car Express and imports, that
7 case was brought by MAVL Capital, Inc.; do you
8 remember this case?
9 A. I remember this case.
10 Q. I believe in this case, the
11 plaintiff also alleges that you are in control
12 of MTL and you are responsible for the actions
13 of MTL. Why would they allege that in 2013?
14 What happened?
15 A. Can my lawyer answer all your
16 questions because he was involved?
17 MR. CHANG: I'm not going to answer
18 his question but I'm objecting to the
19 form. There was two questions.
20 Q. The first question is: What were
21 the circumstances of that case?
22 A. It was stolen property, ships
23 through MTL. Unknown payment for boat cars and
24 some units which MAVL Company and according to
25 the shipping law, he was talking to only his

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1 SOLOVYEV
2 owner of the money. I never talk to him about
3 shipping of his goods. So nobody has proof
4 that I was advised him where to ship, how to
5 ship, that's all what has happened. So one
6 more time stolen property, which he stole ships
7 from MTL and FBI was involved in this case and
8 plus he stole some bull dozer for \$250,000 and
9 that also involved. So right now this
10 company's hiding out of U.S.A. I don't know
11 where this person is.
12 Q. What about the case that you had
13 with Homeland Security where you were named as
14 an individual along with your wife Allah
15 Solovyev and MTL where the United States
16 attorney is alleging that you are an agent for
17 MTL?
18 A. I don't know.
19 MR. CHANG: Is there a question
20 there?
21 A. What is this?
22 Q. What are the -- why would the
23 United States attorney allege that you were
24 involved with MTL in that case where just to
25 remind you that's where it was a case about

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1 SOLOVYEV
2 failure to disclose funds and the United States
3 ended up coming in and taking about \$600,000
4 out of the MTL bank account; do you remember
5 that case?
6 A. Yes.
7 Q. Why would the United States of
8 America state that you were involved with MTL?
9 Why would they tie you to MTL if you have
10 nothing to do with it?
11 A. I have nothing to do with it. It
12 was shipping of some cars through Iran which is
13 an unfriendly blacklister country. This was a
14 case only with MTL not with Car Express or me.
15 Maybe it's a leased but I guzzling money from
16 MTL not from me or my companies, no.
17 Q. But based on their investigation,
18 they found that you were involved with MTL.
19 MR. CHANG: Is there a question?
20 A. I wouldn't be penalized. It wasn't
21 just money penalties, that's all. I have
22 nothing to do with this case.
23 Q. Have you ever been convicted of a
24 crime?
25 A. Convicted of a crime? I've never

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1 SOLOVYEV
2 been convicted.
3 Q. You were never convicted of a crime
4 in New Jersey for receiving stolen property?
5 A. It has to do with the boat?
6 Q. I'm entitled to ask that question.
7 A. I have to object.
8 MR. CHANG: This is whether you --
9 was there a conviction?
10 A. No, there was no conviction.
11 Q. Have you ever been on probation?
12 A. Yes.
13 Q. What were you on probation for?
14 A. Don't matter.
15 Q. It does. Your attorney can explain
16 to you why this is relevant but it is and I'm
17 entitled to ask that question it is actually
18 very important. So can you please explain to
19 me why you were put on probation? What was
20 that in relation to?
21 MR. CHANG: You are asking for
22 the --
23 MS. TARASSOVA: Why was he put on
24 probation? Why would the state of New
25 Jersey put him on probation?

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1 SOLOVYEV
2 A. I don't remember. It was some
3 stolen cars as the property, that's all.
4 Q. What were you accused of?
5 A. I don't remember the stipulation
6 but it was something like stolen Renwickr cars
7 as the property of World Express.
8 Q. Was MTL involved in that?
9 A. No.
10 Q. Did you plead guilty in that case?
11 A. Yes.
12 Q. Other than probation, did you have
13 to serve any time in jail?
14 A. No.
15 (Continued on next page
16 to include jurat.)
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1 SOLOVYEV
2 I N D E X
3
4 WITNESS EXAMINATION BY
5 PAGE
6 6-106 MS. TARASSOVA
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1 SOLOVYEV
2 Q. Have you been convicted of anything
3 else?
4 A. No.
5 MS. TARASSOVA: Those are all the
6 questions I have.
7 THE COURT REPORTER: Would you like
8 a copy of the transcript?
9 MR. CHANG: Sure.
10
11 (Whereupon, at 12:48 p.m., the
12 examination of this witness was
13 concluded.)
14
15 _____
16 ALEKSANDR SOLOVYEV
17
18 Subscribed and sworn to before me
19 this ____ day of _____, 2015.
20
21 _____
22 NOTARY PUBLIC
23
24
25

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1 SOLOVYEV
2 C E R T I F I C A T E
3
4 STATE OF NEW YORK)
5 ss.:
6 COUNTY OF BRONX)
7
8 I, DORENE GLOVER, a Notary Public for
9 and within the State of New York, do hereby
10 certify:
11 That the witness whose examination is
12 hereinbefore set forth was duly sworn and that
13 such examination is a true record of the
14 testimony given by that witness.
15 I further certify that I am not related
16 to any of the parties to this action by blood
17 or by marriage and that I am in no way
18 interested in the outcome of this matter.
19 IN WITNESS WHEREOF, I have hereunto set
20 my hand this 4th day of December, 2015.
21
22 *Dorene Glover*
23 _____
24 DORENE GLOVER
25

<p>1 SOLOVYEV Page 109 2 STATE OF NEW YORK) SS.: 3 COUNTY OF BRONX) 4 5 I wish to make the following changes, for 6 the following reasons: 7 8 PAGE LINE 9 ____ CHANGE: 10 _____ 11 REASON: 12 _____ 13 ____ CHANGE: 14 _____ 15 REASON: 16 _____ 17 ____ CHANGE: 18 _____ 19 REASON: 20 _____ 21 ____ CHANGE: 22 _____ 23 REASON: 24 _____ 25 _____</p>	

Page 2

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 19 Also Present:
 20
 21 Valentina Maydell, Russian Interpreter
 22
 23 Tatiana Timoshkina, wife of witness
 24
 25 Aleksandr Solovyev (with his attorney by
 speakerphone)

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8	Errata Sheet	79
9	EXHIBITS	
10	None	
11		
12		
13		
14		
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Page 4

1 (The interpreter was duly sworn to
 2 translate the proceedings from English to
 3 Russian, and Russian to English as follows:)
 4 THEREUPON,
 5 ALEXANDER SAFONOV,
 6 a witness herein, acknowledged after having been duly
 7 sworn, testified upon his oath as follows:
 8 THE WITNESS: I do.
 9 DIRECT EXAMINATION
 10 BY MR. CHANG:
 11 Q. Good afternoon, Mr. Safonov. My name is Eric
 12 Chang. I'm a lawyer for Marine Transport Logistics
 13 and Aleksandr Solovyev.
 14 A. Good afternoon.
 15 Q. Have you attended a deposition before?
 16 A. No.
 17 Q. Okay. What I'd like to do now is go over
 18 some basic rules for the deposition so you understand
 19 what is going to take place today. Is that all right?
 20 A. Yes.
 21 Q. Mr. Safonov, one of the things I would ask
 22 you to do is to make sure that you give a verbal
 23 response, because everything that we say is being
 24 written down by the court reporter, but she can't
 25 write down anybody's movements or body language.

Page 5

1 A. I will do.
 2 Q. Thank you. What's going to happen today, I
 3 will ask you a series of questions, which you will be
 4 answering under oath to the best of your ability; the
 5 same as if a judge was asking you the questions.
 6 Do you understand?
 7 A. Understood.
 8 Q. If I ask a question and you don't understand
 9 my question, please let me know.
 10 A. I will do.
 11 Q. Otherwise, if you answer the question, we are
 12 going to assume that you understood what I was asking.
 13 A. Okay.
 14 Q. Okay. Also, if I ask a question and you do
 15 not remember the answer, you can say that, because
 16 this is not a test of your memory.
 17 A. Okay.
 18 Q. Lastly, if you need a break at any point,
 19 please let myself or your lawyer know. I would only
 20 ask that if there's a question pending, that you
 21 answer that question before we take a break.
 22 Is that understood?
 23 A. Okay.
 24 Q. Let's begin. Mr. Safonov, where are you
 25 currently residing?

Page 6

1 A. Boca Raton, Florida.
2 Q. Could you give the building number and street
3 address, please?
4 A. 11484 Seagrass Circle.
5 Q. Okay. How long have you lived at that
6 address?
7 A. From the summer, 2014.
8 Q. Do you live alone at that address or is
9 anyone else living with you currently?
10 A. Alone.
11 Q. Where did you live before the summer of 2014?
12 A. Dubai.
13 Q. Could you please state the address of your
14 residence in Dubai prior to the summer of 2014?
15 A. I don't remember exactly. It was Palm
16 Jumeirah Street, but I do not remember the building
17 number.
18 Q. Is there any documents that you have -- not
19 in front of you right now -- but that you have
20 elsewhere that would help you remember the address?
21 A. In general, I believe I do have some
22 documents that will confirm my address.
23 MS. TARASSOVA: Eric, I just want to
24 interject really quick. I think Mr. Safonov,
25 when he answered the question that he lives

Page 7

1 in the house alone, I think he misunderstood
2 the question.
3 Can you ask him that question again,
4 because I think he forgot to mention that his
5 wife lives with him?
6 MR. CHANG: Okay.
7 BY MR. CHANG:
8 Q. Mr. Safonov, at your Seagrass Circle address
9 in Florida, do you live there alone currently or with
10 someone else?
11 A. No. I live with my family.
12 Q. Is that including Mrs. Tatiana Safonov?
13 A. Tatiana Timoshkina; not Safonov.
14 Q. With regard to your Dubai address that you
15 were describing, how long did you live at that
16 address?
17 A. One-and-a-half years.
18 Q. Where did you live prior to that?
19 A. In Moscow.
20 Q. I'm sorry. What was the answer?
21 A. I lived -- prior to Dubai, I resided in
22 Moscow.
23 Q. Russia, correct?
24 A. Russia.
25 Q. Thank you. Mr. Safonov, are you the owner of

Page 8

1 a company called Crocus Investments, LLC?
2 A. Yes, I am.
3 Q. Did you start this company?
4 A. No.
5 Q. Who started the company, Crocus Investments,
6 LLC?
7 A. Yes, I am the one who started the company.
8 Q. Okay. Mr. Safonov, did anyone assist you in
9 starting Crocus Investments, LLC?
10 A. I'm 100 percent owner of the company.
11 Q. When did you start this company?
12 A. In the summer of 2013.
13 Q. Where is this company incorporated or formed?
14 A. In Florida, Aventura.
15 Q. In the summer of 2013, when you started this
16 company, did this company have an office address?
17 A. My company was registered by a law firm, and
18 initially that law firm provided their address. After
19 that, after the company was formed, we added a second
20 address of the company, but I do not remember neither
21 one, neither first or the later added.
22 Q. Okay. Are you still the owner -- 100 percent
23 owner -- of Crocus Investments, LLC, today?
24 A. Yes, I am; 100 percent.
25 Q. Does Crocus Investments have any offices

Page 9

1 today?
2 A. Our company office is at our home.
3 Q. When you said that you did not remember what
4 the second address was in 2013, was that a different
5 address than your home today?
6 A. No. It wasn't my present address of my
7 present home. It was, I believe, Pembroke or
8 something town -- Pembroke Pines.
9 Q. How many employees does Crocus Investments
10 have today, including yourself?
11 A. Just two of us; my spouse and I.
12 Q. That would be referring to Tatiana; correct?
13 A. Yes.
14 Q. Other than yourself and Tatiana, does Crocus
15 Investments have any other employees from 2013 through
16 today?
17 A. No.
18 Q. Mr. Safonov, what is your official title with
19 Crocus Investments?
20 A. Owner.
21 Q. Do you have any other job titles?
22 A. Well, I would say general manager.
23 Q. What kind of business does Crocus Investments
24 do today?
25 A. Online business.

Page 10

1 Q. What do you mean by, "online business"?

2 A. That is commercial secret.

3 Q. Okay. Does Crocus Investments provide

4 services to customers?

5 A. Not at this time. Not at present.

6 Q. At present, does Crocus Investments sell

7 goods to customers?

8 A. No. At present, we offer consultation only.

9 Consulting services.

10 Q. Does Crocus Investments have an online

11 website?

12 A. Yes.

13 Q. What is the website address?

14 A. There are a few website addresses, and that

15 is also a commercial proprietary -- or secret.

16 Q. Mr. Safonov, how do Crocus Investments

17 customers know who you are if you do not have a public

18 website?

19 A. Well, online business works by itself. We

20 don't have to look for clients. This is analytical

21 website.

22 Q. Did you say you have two websites for Crocus

23 Investments?

24 A. Yes.

25 Q. How long has Crocus Investments been

Page 11

1 operating these two websites?

2 A. Approximately half a year.

3 Q. Did Crocus Investments have any websites

4 prior to half a year ago?

5 A. Yes, Crocus Investments had, also, website.

6 Q. Did Crocus Investments have a website in 2014

7 and 2013?

8 A. Yes, correct.

9 Q. One website or more than one website?

10 A. One website.

11 Q. When did Crocus Investments start using that

12 one website?

13 A. In 2013.

14 Q. Is that since the beginning of the company?

15 A. Yes. When I opened the company, I also

16 prepared or made ready a website for the Crocus

17 Investments company, and the website was related to

18 boats -- motor boats -- rental -- renting motor boats.

19 MS. TARASSOVA: He said it wasn't up.

20 A. Yes; however the website was ready, but I

21 have never put -- connected it to internet.

22 BY MR. CHANG:

23 Q. Okay. Just so I understand, does that mean

24 that you never had a website address for your

25 motorboat website?

Page 12

1 A. I had the address. I registered it. I just

2 didn't open the site. I can even give the address --

3 registered address -- for my first website.

4 Q. Mr. Safonov, could you please provide us with

5 that registered address?

6 A. Crocusmarine.com.

7 Q. When you started Crocus Investments in 2013,

8 what type of business were you doing?

9 A. That was for motorboat rentals.

10 Q. Did you provide any consulting services in

11 2013?

12 A. No.

13 Q. What kind of business was Crocus Investments

14 doing in 2014?

15 A. Consulting. Hold on. 2014 -- if you mean in

16 year 2014, I believe we didn't offer any services in

17 2014. We started consulting from 2015.

18 Q. In 2013, for motorboat rentals, how many

19 boats did you own or lease?

20 A. Three here in United States. Are you asking

21 2013? Please repeat again.

22 Q. In 2013, how many motor boats did Crocus

23 Investments have, either owned or leased?

24 A. Crocus Investments had, in 2013, one boat,

25 and that one boat we bought from Mr. Solovyev.

Page 13

1 Q. Do you remember the year, make and model of

2 that one boat?

3 A. It was Formula 24, year 2010.

4 Q. This Formula boat was at Crocus Investments

5 in Florida?

6 A. No. Mr. Solovyev stole it.

7 Q. Okay. In 2013, did Crocus Investments

8 successfully rent any boats to any customers?

9 A. No, we did not rent one, because Solovyev

10 never gave us that boat.

11 Q. Is it correct that, in 2013, Crocus

12 Investments did not obtain any rental revenue from the

13 renting of motorboats?

14 A. Yes. The company, Crocus, has not received

15 any profit or, actually, income from renting of a

16 boat.

17 Q. In 2014, did Crocus Investments have any

18 motorboats either owned or leased?

19 A. Yes. In 2014, I shipped personally, from

20 Dubai, two boats as a property of Crocus Investments.

21 And these two boats, Solovyev did not -- these two

22 boats were shipped from Dubai to him, and he did not

23 ship it forward -- the shipping. So we have not

24 received the two boats we shipped from Dubai via

25 Mr. Solovyev.

Page 14

1 Q. Mr. Safonov, are you referring to the two
2 boats that are at issue in this case, a Chaparral and
3 a Monterey?
4 A. Yes, correct.
5 Q. So is it correct that, in 2014, Crocus
6 Investments did not make any income from motorboat
7 rentals?
8 A. That is correct. Not even -- in 2014, no.
9 Q. Other than motorboat rentals, did Crocus
10 Investments make any income in 2013?
11 A. No; no other income.
12 Q. Mr. Safonov, you understand, when I use the
13 word "income," I mean any money earned or obtained by
14 the company during that year. Do you understand?
15 A. The company or Crocus Investments did not
16 have any income.
17 Q. Okay. But, Mr. Safonov, you understand that
18 when I say, "income," it doesn't mean just profits.
19 It means any money earned.
20 A. I understand the difference between income
21 and profit. But in that year, this company, which is
22 Crocus Investments, no money went through, in or out.
23 Q. Okay. In 2014, did Crocus Investments have
24 any income?
25 A. No. It's the third time you asked.

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1 MS. TARASSOVA: Eric, the prior
2 questions, weren't they about 2014 as well?
3 MR. CHANG: I think it was just 2013.
4 MS. TARASSOVA: Oh, no. We understood
5 all the questions --
6 THE INTERPRETER: I'm writing it down.
7 MS. TARASSOVA: The interpreter wrote
8 down '14. So the answers as they were
9 answered, it was for the year 2014.
10 MR. CHANG: I apologize for that.
11 BY MR. CHANG:
12 Q. In 2013, did Crocus Investments have any
13 income?
14 A. No, no income. 2013, no.
15 Q. In 2015, did Crocus Investments have any
16 income?
17 A. As of today, none.
18 Q. Mr. Safonov, if I'm asking the same question
19 more than once and you answered more than once, please
20 feel free to let me know. Understood?
21 A. Okay.
22 Q. Thank you. In 2013, were you employed or
23 working with any other company other than Crocus
24 Investments?
25 A. Yes, I worked.

Page 16

1 Q. Where were you working other than Crocus
2 Investments in 2013?
3 A. Company in Dubai.
4 Q. What was the name of this company in Dubai?
5 A. Middle East Asia Alfa.
6 Q. I will refer to this company as "Middle
7 East." When did you begin working for Middle East?
8 A. There was also a second company. It was
9 Crocus FZE.
10 Q. Mr. Safonov, when did you begin working with
11 Middle East?
12 A. I'm co-founder of that company from
13 April 2013.
14 Q. Are you still a co-founder today of Middle
15 East? Let me take that back. Sorry. Were you a
16 co-owner of Middle East in 2013?
17 A. Yes; I was also co-owner with decision-making
18 rights for the company.
19 Q. Today, in 2015, are you still a co-owner of
20 Middle East?
21 A. I haven't been to Dubai for almost a year or
22 over a year, so I don't know if that Middle East
23 company still exists. I think it was closed.
24 Q. When was the last time that you were in
25 Dubai?

Page 17

1 A. In May. We moved here -- I misunderstood. I
2 think we moved here in May 2014, but the last time we
3 were in Dubai, it was August 2014.
4 Q. Were you still co-owner of Middle East in
5 August of 2014?
6 A. Yes.
7 Q. What kind of business does Middle East do?
8 A. Okay. Repair and sale of motorboats.
9 Q. Was that always Middle East's business since
10 it started in 2013 through August 2014?
11 A. Yes, that was the services that company
12 provided -- Middle East has provided from the
13 beginning.
14 Q. In April 2013, how many employees did Middle
15 East have, including any officers of the company?
16 A. Officially employed or also part-time or
17 under-the-table workers, yes -- so-called seasonal
18 workers.
19 MS. TARASSOVA: Let me correct that
20 translation. He never said,
21 "under-the-table." He meant, like,
22 contractors. There's nothing under the
23 table.
24 THE INTERPRETER: Seasonal workers.
25 MS. TARASSOVA: Can we strike that from

Page 18

1 the record, Eric?
2 MR. CHANG: Louiza, I'm going to ask the
3 court reporter to read back the answer. Did
4 he give a number of workers, or no?
5 THE WITNESS: Nine or ten people.
6 BY MR. CHANG:
7 Q. Who was the other co-owner of Middle East in
8 2013?
9 A. Oleg Bortsov.
10 Q. Do you know a person by the name of Andrey
11 Tretiakov?
12 A. I know.
13 Q. Did Andrey work for Middle East in 2013?
14 A. Yes.
15 Q. Mr. Safonov, what was your job title with
16 Middle East in 2013?
17 A. I didn't have any other than owner.
18 Q. Do you know what Oleg's job title was with
19 Middle East?
20 A. General manager.
21 Q. Do you know what Andrey's title was with
22 Middle East?
23 A. Associate. He was more like associate.
24 Q. Did Oleg have decision-making authority on
25 behalf of the company?

Page 19

1 THE INTERPRETER: This is interpreter.
2 Could you repeat what authority? I didn't
3 hear exactly what you said.
4 MR. CHANG: Okay. Decision-making
5 authority.
6 Who is speaking right now? Is someone
7 else speaking other than Mr. Safonov? I'm
8 just hearing overlap.
9 MS. TARASSOVA: Tatiana was talking. Can
10 you repeat the question? Because I think
11 we're confused. Do you want the court
12 reporter to read back the question?
13 MR. CHANG: I'd like the interpreter to
14 translate what was just said, if that's
15 possible.
16 THE INTERPRETER: Yes. Once interpreter
17 asked to clarify what authority --
18 decision-making authority -- so Mr. Safonov
19 answered that, since he was the owner with
20 main decision-making package -- I assume he
21 had -- so he made all major decisions related
22 to the company business. It was Mr. Safonov.
23 But Oleg, as the general manager, his
24 decision making was limited to repairs,
25 maintenance or technical or sales.

Page 20

1 BY MR. CHANG:
2 Q. Do you know what Andrey's job duties were in
3 2013?
4 A. Also repair of boats; also to pick up or meet
5 the boats that arrived from Solovyev, or shipped by
6 Solovyev, to meet and pick up at the port. So Mr.
7 Tretiakov would go to the port, pick up or meet with
8 those who brought the boat, and was responsible to
9 deliver it.
10 Q. Deliver it to where?
11 A. To the warehouse, and, also, where the boat
12 maybe need to be repaired -- to the warehouse. Also,
13 he was in charge to find spare parts for repairs.
14 Q. Is that a warehouse owned by Middle East?
15 A. Yes, correct.
16 Q. Do you know when Middle East first started
17 using that warehouse?
18 A. I don't remember exactly, but I believe it
19 was from April 1st, 2013; and I was the one who rented
20 it -- the warehouse -- and I paid for it.
21 Q. Did you pay for the warehouse through August
22 of 2014?
23 A. No. I rented this warehouse for one year, so
24 I didn't pay til August of 2014; because we rented it
25 for a year, and then we moved into the office

Page 21

1 building.
2 Q. Okay. After April of 2014, did Middle East
3 rent or own any warehouse space?
4 A. Yes. We had at that time -- from April 1st,
5 we had office building and warehouse.
6 Q. Were you also the person who paid for the
7 rent of the new warehouse in April 2014?
8 A. Yes; I was the one who paid for that new.
9 Q. Okay. With regard to Middle East, were you
10 personally involved in the repair of motorboats?
11 A. No.
12 Q. Were you involved in -- were you personally
13 involved in the sale of motorboats by Middle East?
14 A. Yes, of course, I was. Without my decision,
15 nobody has right to sell anything. And I'm talking
16 about boats; because they had right to sell some cars,
17 but no authority to sell boats.
18 Q. Earlier, you mentioned that the business of
19 Middle East was for the repair and sale of motorboats;
20 is that correct?
21 A. Initially, and our intention was to sell
22 boats. That's what we did -- most of our business.
23 Just, somewhat late, Solovyev asked us to sell some
24 cars -- his cars. He asked us, actually, to help him
25 to sell his cars.

Page 22

1 Q. Do you remember how many cars Mr. Solovyev
2 asked you or Middle East to help him sell?
3 A. Two cars. He asked for help to sell off
4 quite a few cars. The amount of cars will be quite a
5 few, but he sent only two cars.
6 Q. Okay. Just so I understand, you're saying,
7 from 2013 through 2014, Middle East only helped
8 Mr. Solovyev sell two cars; is that correct?
9 A. Not exactly. The story is that his friend
10 actually stole those two cars, so I don't know exactly
11 what was going on -- what's the story with those cars.
12 One car, from what I know, he sold it without
13 my actually knowing -- it was in secrecy that he sold
14 one car -- and then sent money to Solovyev, and he did
15 it so I would not notice it or not find out about
16 that.
17 Q. When you say he sold the one car, who are you
18 referring to?
19 A. Andrey Tretiakov, the friend of Mr. Solovyev.
20 Q. Okay. Do you remember the make and model of
21 the one car that you say Andrey sold?
22 A. It was Mercedes SL65. I do not remember
23 year.
24 Q. How about the other of the two cars; do you
25 remember the make and model?

Page 23

1 A. The second one was Porsche Panamera.
2 Q. Other than these two cars, did Middle East
3 sell any other cars from 2013 to 2014?
4 A. I am not aware of any other cars. Maybe
5 they -- Andrey and his friend -- managed to bring and
6 sell some cars, but I am not aware of any other car.
7 Q. So other than these two cars, did Middle East
8 do any other business besides repair and selling of
9 motorboats?
10 A. No, nothing more.
11 Q. When did you first meet Oleg?
12 A. I'm not sure. February or March 2013.
13 Q. How did you meet Oleg in February-March 2013?
14 A. I think it was -- I saw advertisement, online
15 newspaper.
16 MS. TARASSOVA: I think he gave the
17 advertisement.
18 A. The answer is that I saw some advertisement.
19 It was in online newspaper at that time.
20 BY MR. CHANG:
21 Q. Do you remember the name of the online
22 newspaper?
23 A. No, I do not.
24 Q. What did the advertisement say?
25 A. The ad would say, more or less, like this:

Page 24

1 "Looking for investor to open plant or shop," so
2 looking for investor to open a business.
3 Q. How long after you saw this advertisement did
4 you meet Oleg?
5 A. The advertisement was placed by Tretiakov.
6 And I believe the same week that I read it or saw it,
7 we met.
8 Q. You met Oleg; is that correct?
9 A. No. Initially, we met with Andrey. Oleg is
10 Andrey's son.
11 Q. After you met with Oleg and Andrey, did you
12 invest in their proposed company?
13 A. No. Initially, we prepared the business
14 plan. And when we prepared this business plan,
15 Andrey, of course, said then that he has a friend,
16 Solovyev, who will ship or provide boats, and we will
17 repair and sell them.
18 Q. When you said, "We were preparing a business
19 plan," that meant you and who else?
20 A. I -- myself -- Andrey and Oleg.
21 Q. After the business plan was created, did you
22 invest in the proposed company?
23 A. Of course.
24 Q. And this company became Middle East; correct?
25 A. Correct.

Page 25

1 Q. How much was your first or initial investment
2 into Middle East?
3 A. I do not remember exact details; but, at that
4 time, Oleg didn't have any money whatsoever. So I
5 agreed to put my part and also for Oleg's part. So I
6 provided for two -- both of us -- approximately half a
7 million dollars.
8 Q. Okay. And the approximately half a million
9 dollars was 100 percent of the initial investment;
10 correct?
11 A. So, yes, that was initial. And to add to it,
12 Oleg wrote, also, promissory note. It was official
13 paper -- promissory note that he will repay me back
14 within six months the amount that I loaned him, or he
15 borrowed from me; and there will be about five
16 percent, I believe, interest on that.
17 Q. Okay. After the initial 500,000 US dollar
18 investment, did you make any further investment into
19 Middle East?
20 A. I do not remember exactly or precisely what
21 sum was invested, but I do remember that it was close
22 to half a million dollars, US dollars.
23 Q. My question is: After the initial
24 investment, did you make any additional investment
25 into the company?

Page 26

1 A. No additional.
 2 Q. Okay. When you and Oleg started Middle East,
 3 did you sign any contracts or agreements stating what
 4 each partner's responsibilities were?
 5 A. The agreement or the promissory note that was
 6 written agreement, it's about the money that Oleg has
 7 to pay me back -- what I invested for him in the
 8 company. Then articles of the company were written in
 9 English. So I do not remember exactly what the
 10 articles say.
 11 Q. Was Middle East incorporated in Dubai?
 12 A. Yes. In United Arab Emirates. The city is
 13 Sharjah.
 14 So we created, at that time, two agreements
 15 or two contracts. One is about money that I invest
 16 for myself and him, and he has to repay me; and the
 17 second one about who is in charge of what -- the
 18 responsibilities of each party.
 19 Q. Mr. Safonov, who prepared the articles of
 20 incorporation?
 21 A. In City of Sharjah in United Arab Emirates,
 22 there is a so-called city zone where you get the
 23 templates for how the articles of incorporation or LLC
 24 -- so we used there and it's free of charge. We just
 25 filled it in.

Page 27

1 Q. Okay. You signed the articles of
 2 incorporation; correct?
 3 A. Yes.
 4 Q. Who else signed the articles of
 5 incorporation?
 6 A. All documents that we created were signed by
 7 each of -- both of us, Oleg and I.
 8 Q. Mr. Safonov, do you read English?
 9 A. Well, depends on what you mean, "read in
 10 English." When I look at the English text, I can
 11 see -- I read the title, I can see date, if there is
 12 state or some names.
 13 Q. Did you have any difficulty reading and
 14 understanding the articles of incorporation?
 15 A. Of course I had, because I don't know English
 16 that well.
 17 Q. Did you have someone reading the articles of
 18 incorporation to you?
 19 A. Andrey and Oleg, they both know English.
 20 Q. And did they translate the articles of
 21 incorporation to you?
 22 A. No, they did not.
 23 Q. Was the promissory note written in English?
 24 A. It was -- the promissory note was written in
 25 English, but when that was to sign -- and it was

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1 actually prepared -- I had interpreter. So
 2 interpreter -- I'm familiar with what was written in
 3 the promissory note.
 4 Q. Okay. From now on, when I talk about Middle
 5 East, I mean from 2013 through 2014 when you were
 6 involved as co-owner. Do you understand?
 7 A. Yes, I understand.
 8 MS. TARASSOVA: Eric, is it possible to
 9 take a break soon?
 10 MR. CHANG: Sure, that's fine. How long
 11 do you want?
 12 MS. TARASSOVA: Like, five minutes.
 13 MR. CHANG: Okay.
 14 MS. TARASSOVA: Is this a good time?
 15 MR. CHANG: It's fine.
 16 (Brief recess.)
 17 BY MR. CHANG:
 18 Q. Were you personally involved in the
 19 purchasing of motorboats for Middle East?
 20 A. Of course.
 21 Q. Where did Middle East get motorboats for
 22 repair and sale?
 23 A. From Solovyev.
 24 Q. But did anybody else at Middle East have
 25 involvement in the purchasing of motorboats?

Page 29

1 A. The decision making, which boat and selection
 2 and so on, was always mine. Online with Solovyev, I
 3 would look over or view the boats. And then I would
 4 make decision which one I will make -- the choice --
 5 choose the boats, and then make decision of
 6 purchasing.
 7 Q. You were the only one who had the
 8 decision-making authority for the purchase of these
 9 boats; correct?
 10 A. Yes, I'm the only one who had the authority
 11 of decision making because I'm the only one who had
 12 the money.
 13 Q. Do you know how many boats Middle East
 14 purchased from 2013 to 2014?
 15 A. I think it was ten.
 16 Q. Did you purchase, personally, all ten boats?
 17 A. Most of those boats, I made decision. Some
 18 decision making -- maybe on two or three purchases,
 19 decision was made by Sergey. There was such a
 20 associate there -- or person -- Sergey, S-E-R-G-E-Y.
 21 Q. Sergey is an associate with Middle East?
 22 A. He was a part-time, let's say, associate or
 23 employee for a certain period of time. He decided
 24 that he wanted to purchase two or three boats, repair
 25 them and sell, but do it through our company.

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1 Q. Okay. I'm going to use an estimate of ten
2 boats that you personally purchased for my question.
3 Is that understood?
4 A. Yes, ten. That's the one that we had in our
5 warehouse. We repaired them. That's for sure.
6 Q. Of the boats that you personally purchased,
7 do you remember where they were purchased from?
8 A. Those boats were purchased, together with
9 Solovyev, while being online -- auction called Copart.
10 That's American auction company.
11 Q. Did you ever purchase any boats from any
12 other person or place?
13 A. No. All boats were purchased from Solovyev.
14 Q. Were you personally involved in arranging the
15 transportation of these boats from the US to Middle
16 East in Dubai.
17 A. No, because that was doing -- Solovyev.
18 Mr. Solovyev, he was in charge of that.
19 Q. Okay. Who at Middle East was in charge of
20 getting the boats from the US to Dubai?
21 A. During auction, I and Solovyev were there. I
22 chose the boat and we bought it. And Solovyev would
23 be paid commission once I purchased the boat in
24 auction. And then his company, Logistics, was
25 responsible to arrange shipping of purchased boat from

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1 US to Dubai; and in Dubai, also to receive it and
2 deliver.
3 MS. TARASSOVA: Eric, did you get your
4 answer? Because I kind of know what you're
5 asking and I don't know if they answered it
6 collectively.
7 MR. CHANG: Not really, but.
8 MS. TARASSOVA: I think Mr. Safonov is
9 not sure if you're asking him what you're
10 asking him. Let me --
11 MR. CHANG: Could the court reporter read
12 the question?
13 THE REPORTER: "Who at Middle East was in
14 charge of getting the boats from the US to
15 Dubai?"
16 THE WITNESS: Okay. Now, I was the one
17 who would choose at auction which boat to
18 bid, which to buy. I paid -- I bought the
19 boat and also paid commission to Solovyev.
20 And Solovyev was responsible for shipping
21 organizing -- shipping of that boat from US
22 to Dubai. And in Dubai, Andrey was the one
23 who was supposed to receive the shipment and
24 deliver to warehouse.
25 BY MR. CHANG:

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1 Q. Okay. If Solovyev had problems with the
2 transportation, who would he talk to at Middle East?
3 A. To me in Middle East if he has problem.
4 Q. If Middle East wanted to change any
5 transportation arrangements, who at Middle East would
6 talk to Solovyev?
7 A. In that case, I -- I am the one who will make
8 decision.
9 Q. Do you remember when you purchased your first
10 boat from Copart?
11 A. I don't remember exactly. I believe it was
12 March; maybe April. I would rather say March.
13 Q. Okay. You described looking at an auction
14 with Solovyev to pick out the boats, correct?
15 A. Yes.
16 Q. Is that an online auction?
17 A. Skype -- through Skype.
18 Q. Is it correct that you would -- how did you
19 find the boats that you wanted at the auction?
20 A. It's elementary. You just go on the website
21 of that auction and view whatever they have to
22 auction. There is a website, Copart Auction.
23 Q. Mr. Safonov, how did you find the Copart
24 website?
25 A. The website I got, Andre Tretiakov, he

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1 provided the name or address of the website.
2 Q. Do you need a user name to access the auction
3 website?
4 A. Yes. One needs to register with the website
5 first.
6 Q. Did you register for the website?
7 A. Of course. Otherwise, I would not be able to
8 do anything.
9 Q. Okay. Is this website open to the public?
10 A. Of course. How I got there? The same way.
11 It's just public. You go and register and
12 participate.
13 Q. Okay. If you registered for the website, why
14 did you need Solovyev to help you purchase the boats?
15 A. The problem would be how to deliver, ship it
16 from one place to another without American company
17 here. You can't go through the customs. You can't do
18 all the shipping, paperwork and the shipping itself.
19 For shipping abroad, you have to have a
20 higher company that is licensed. Even if I would come
21 to United States and buy my -- buy some boat -- in
22 order to ship it back to whatever place I live, I will
23 have to hire a licensed company to do that.
24 Q. In 2013, were you living in Florida?
25 A. No. We just came here in the summertime of

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1 2013 to register our company here.
2 Q. How many months did you spend in Florida in
3 2013?
4 A. Two.
5 Q. Do you remember which months?
6 A. July and August. I remember because children
7 start school, and our child starts school
8 September 1st. So we left at the end of August – 26,
9 27. End of August, we left for home.
10 Q. Where was your full-time residence in 2013?
11 A. Dubai.
12 Q. Okay. Once you purchased the boats from
13 auction, how did you pay for the boats?
14 A. The payment was made from my company, Crocus
15 FZE.
16 Q. Was the payment by credit card, by wire?
17 A. Bank wire.
18 Q. Did you wire the purchase money to the
19 auction directly?
20 A. No. I wired it to Solovyev's company.
21 Q. So how did the auction get their money for
22 the boats?
23 A. From Solovyev.
24 Q. Did you – and by you, I mean Crocus FZE --
25 wire the money to Solovyev before or after Solovyev

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1 wired the money to the auction house?
2 A. Before – before the Copart auction --
3 because auction company allows only three days for
4 money wiring for the purchased item.
5 Q. So do you know if Solovyev paid the auction
6 house before you paid Solovyev?
7 A. I don't know, but I believe that nothing like
8 that could have ever happened. He never could
9 purchase anything on the money that he has. Also, as
10 a business point of view, it doesn't make much sense,
11 because, in case I would say, "Oh, I changed my mind,"
12 then he will be stuck with boat. In business, nobody
13 does like that.
14 Q. Okay. Do you know how long it takes for a
15 bank wire to clear from Dubai to the US?
16 A. 24 hours. Actually, one business day.
17 Q. Was the same procedure followed for every
18 boat that you personally purchased from Solovyev?
19 A. Down the road -- not at the beginning, but
20 down the business trail, I sent or wired money ahead
21 to Solovyev, so Solovyev would have some extra money
22 just in case -- for different operations or whatever
23 needs might pop up.
24 One business day, why it takes to clear the
25 money, is because every time money -- I wire money.

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1 Within 24 hours, he will call me and say, "I got the
2 money. The money is clear."
3 Q. After you purchased the boat and after you
4 paid for the boat, would you give instruction on where
5 to ship the boats to Solovyev?
6 A. Yeah. He had to ship each boat to Middle
7 East Asia Alfa. Solovyev, initially, I thought, told
8 me he supposed to ship the boats to my company Crocus
9 FZE; however, he told me that he needs to ship it to
10 Middle East Asia Alfa company for the reason that
11 there is a free zone in Dubai and it will be -- the
12 shipping itself will cost less. Of course, later, I
13 learned that it wasn't true. They could have shipped
14 directly to my company, Crocus.
15 Q. Did you give directions to Mr. Solovyev to
16 ship to Middle East?
17 A. Yeah, I gave directions.
18 Q. Before that, did you suggest to Solovyev to
19 ship the boats to Crocus FZE?
20 A. No. He shipped first boat, and all of them,
21 to Middle East company. Only later, when I found out
22 that it is a scheme, that boats have to be shipped to
23 Middle East Asia company, I told him that I want him
24 to ship to Crocus FZE.
25 Q. I apologize if I'm confusing. Earlier you

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1 said that you wanted the boats shipped to Crocus FZE,
2 but you were convinced instead to ship to Middle East
3 because of a free zone. Is that correct?
4 A. Yes, that's correct.
5 Q. Did you give instructions to anybody to ship
6 the boats initially to Crocus FZE?
7 A. I didn't discuss that issue with Solovyev --
8 Mr. Solovyev. With our business, Mr. Solovyev was --
9 that from the beginning -- he has to ship boats to
10 Middle East company.
11 Q. Are you the owner of Crocus FZE?
12 A. Yes, 100 percent.
13 Q. When did you start Crocus FZE?
14 A. November 2012.
15 Q. Where is Crocus FZE incorporated or
16 registered?
17 A. In United Arab Emirates, city Ras al-Khaimah.
18 Q. Do you hold citizenship in the UAE?
19 A. No, I don't have citizenship.
20 Q. Where is your country of citizenship?
21 A. Russia.
22 Q. Has it always been Russia, or do you have
23 separate or dual citizenships?
24 A. I don't have dual. I always -- I actually
25 have had initial Soviet citizenship when Soviet Union

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1 existed; and after that, I become -- my citizenship is
 2 country, Russia.
 3 Q. Are you in the US on a visa?
 4 A. Of course.
 5 Q. Do you know what type of visa?
 6 A. I applied for student visa and still waiting
 7 for that.
 8 Q. When did you apply for the student Visa?
 9 A. In June, I believe.
 10 Q. June of which year?
 11 A. This year, 2015.
 12 Q. What's your highest level of education?
 13 A. I'm an attorney, or I have degree in
 14 jurisprudence.
 15 Q. Which institute awarded you the degree of
 16 jurisprudence?
 17 A. Moscow State Law Academy -- State Academy of
 18 jurisprudence. Law school in the United States.
 19 Q. Is that a question for me?
 20 THE INTERPRETER: No. It's in other
 21 words, the translation for you.
 22 BY MR. CHIANG:
 23 Q. When did you get your degree from the Moscow
 24 State Law Academy?
 25 A. I graduated in 2000 -- year 2000.

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1 Q. Have you ever practiced as an attorney?
 2 A. No. I always worked in a business as a
 3 businessman.
 4 Q. When did you enter the Moscow State Law
 5 Academy?
 6 A. In 1995.
 7 Q. Were you attending any university or college
 8 institute prior to 1995?
 9 A. No.
 10 Q. Were you working full-time before 1995?
 11 A. I was in military -- served military.
 12 Q. Where did you first work after graduating
 13 from the Moscow State Law Academy?
 14 A. Once I graduated, I registered right away --
 15 a company in Moscow.
 16 Q. What was the name of that company?
 17 A. AES Invest, if you are interested.
 18 Q. What did this company do?
 19 A. Real estate.
 20 Q. Does that mean finding and purchasing homes
 21 for other people?
 22 A. Yes, of course; all transactions -- buying,
 23 selling real estate.
 24 Q. Did that include buying and selling real
 25 estate for your personal investment?

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1 A. Sure. Once I made the profit, I bought for
 2 myself, apartment.
 3 Q. How long did you have this real estate
 4 company?
 5 A. I do not remember. Maybe three, maybe five
 6 years.
 7 Q. Okay. Do you remember where you worked after
 8 that?
 9 A. Then, after that, I also registered another
 10 company.
 11 Q. What was the name of this company?
 12 A. An Energo Construction Project --
 13 Energo-Stroy -- E-N-E-R-G-O, dash, S-T-R-O-Y, Project.
 14 Q. What type of business did Energo Construction
 15 Project do?
 16 A. Engineering and communication.
 17 Q. You were the owner of this company?
 18 A. Yes.
 19 Q. Do you remember how many employees this
 20 company had?
 21 A. It varied from 50 up to 120 employees.
 22 Q. How long did you continue to work with Energo
 23 Projects?
 24 A. Till the end of 2011.
 25 Q. Where did you next work after 2011?

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1 A. We moved to Dubai.
 2 Q. Where did you next work in Dubai?
 3 A. I registered my first company there, Crocus
 4 FZE.
 5 Q. Okay. With your real estate company, why did
 6 you decide to leave real estate?
 7 A. Because I bought final apartment for myself,
 8 and I didn't want to continue that. I didn't like
 9 that type of business.
 10 Q. Did you sell the company?
 11 A. No. In Russia, at the time, you don't sell
 12 company to somebody else. You just close it.
 13 Q. With Energo Projects, why did you decide to
 14 leave in 2011?
 15 A. I got tired.
 16 Q. Did you sell Energo Projects to anybody?
 17 A. No; I closed it as well. At that time, I
 18 needed some medical treatments that I was seeking
 19 abroad, so I decided to close company and we left.
 20 Q. Have any of your companies ever filed for
 21 bankruptcy?
 22 A. No.
 23 Q. What type of business does Crocus FZE do?
 24 A. The company that I opened, I wanted to be
 25 investor. I was looking for the companies to

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1 invest -- to be investor. As soon as I moved there,
2 these two Tretiakovs showed up.
3 And, if you actually -- in order to get Dubai
4 visa, you have to declare yourself of being capable
5 investor. Otherwise, no visa.
6 Q. Did Crocus FZE invest in any other companies?
7 A. No; only this one.
8 Q. I'm sorry?
9 A. Only this one.
10 Q. Only Middle East; correct?
11 A. Yes.
12 Q. Did Crocus FZE have any contractual
13 relationship with Middle East?
14 A. Yes; there was agreement between Crocus FZE
15 and company, Middle East Asia Alfa, that I, as Crocus
16 FZE, invest my money into Middle East Asia Alfa. Not
17 only my part of the money, but also invest money in
18 their part that -- what they're supposed to invest --
19 so for two people.
20 Q. Do you know how many boats were repaired by
21 Middle East?
22 A. All of them that came in, all were repaired.
23 Q. Do you know how many boats were sold by
24 Middle East?
25 A. Seven.

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1 Q. What was Middle East's income for the year
2 2013?
3 A. In 2013, the company, Middle East, didn't
4 have any. Actually, they lost -- the company lost
5 money.
6 Q. I'm sorry to hear that. In 2014, did Middle
7 East have any income?
8 A. The income was from seven boats that we sold.
9 Whatever those seven boats were sold, that was income;
10 but it did not cover the expenses of the company
11 repairs and the rest.
12 Q. Do you remember approximately how much that
13 income was in 2014 we're talking about?
14 A. I don't know the numbers, because, in that
15 company, everything was so bad -- looking bad -- that
16 I do not remember and do not want to. Nobody was
17 actually counting money in that company.
18 Q. Just to clarify, earlier, when you said there
19 was no income for Middle East in 2013, were you
20 referring to revenue or to profit?
21 A. Talking about profit. There was none in 2013
22 and 2014. No profit for sure. They were stealing
23 everything.
24 Q. When you say "they," who are you referring
25 to?

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1 A. Tretiakov, with his son, Oleg.
2 Q. I'm going to ask you questions about the
3 three boats at issue in this case. Do you know which
4 boats I'm referring to?
5 A. Yes, I'm aware of what boats you're talking.
6 Q. Other than these three boats, did you have
7 any problems with the purchase and shipping of boats
8 through Mr. Solovyev?
9 A. No. Everything was fine.
10 Q. Starting with the Chaparral and the Monterey,
11 do you remember when these two boats were purchased?
12 A. I don't remember exactly, but, approximately,
13 it was May 2013. All boats were purchased between
14 March and August. But which boat was purchased
15 exactly what month, I do not remember. But we do have
16 receipts or invoices.
17 Q. I'm just going to represent to you that the
18 Chaparral and Monterey were purchased in May 2013. Is
19 that understood?
20 A. Uh-huh.
21 Q. Does that sound correct?
22 A. I already told you that I do not remember,
23 but if you want to let me look up in computer?
24 Q. That's fine.
25 MS. TARASSOVA: Eric, I'm showing him the

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1 bill of sale for the Chaparral.
2 MR. CHANG: Do you have a Bates number
3 for the document?
4 MS. TARASSOVA: Yes, it's P-7.
5 MR. CHANG: Do you want us to mark it as
6 an exhibit, Louiza?
7 MS. TARASSOVA: I'm trying to refresh his
8 memory so he can confirm the information.
9 MR. CHANG: That's fine.
10 MS. TARASSOVA: Then I'm showing him the
11 certificate title for the Chaparral.
12 MR. CHANG: Can we get a Bates number for
13 that too?
14 MS. TARASSOVA: P-8.
15 MR. CHANG: Okay.
16 THE WITNESS: Okay. Chaparral, 2008, the
17 receipt is July 5th, 2013. Hold on. And
18 Monterey, the bill is dated April 18th.
19 BY MR. CHANG:
20 Q. For these two boats, how did you purchase
21 these boats?
22 A. Okay. We went on a website, Copart auction.
23 On their website, they post, usually, a date -- exact
24 date of the auction that this particular -- that sale
25 will take place. And, also, they show on a website

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1 that this particular boat -- what exact day it will be
 2 auctioned -- when one can participate in the auction.
 3 Q. Okay. Were you in communication with anybody
 4 when you purchased these boats?
 5 A. The auction is run online on the screen.
 6 Solovyev participated, and I. We both simultaneously
 7 participated in that auction. You see online how much
 8 the bid is -- each bid and so on. It's same like we
 9 are sitting with you right now and talking. I sat
 10 online with Solovyev and witnessed auction and were
 11 doing bidding.
 12 Q. So you were on a video conference of some
 13 type with Solovyev when purchasing these boats?
 14 A. Of course.
 15 Q. Was there anybody else as part of that video
 16 conference?
 17 A. Andrey also was sitting, witnessing -- just
 18 watching all of it.
 19 Q. Where were you physically at the time of this
 20 video conference?
 21 A. I was in Dubai. Each one of us was at own
 22 home. I was in Dubai. Solovyev was in New York.
 23 Andrey also was at his home.
 24 Also, when auction is in New York, then, in
 25 Dubai, it's a deep late night, so usually it's like

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1 10:00, 11:00 at night, or even later.
 2 Q. After you purchased the two boats, you would
 3 wire transfer the purchase money to Mr. Solovyev's
 4 company; is that correct?
 5 A. As soon as the bidding is over and we got the
 6 highest bid, within an hour or two, Solovyev would
 7 send right away, electronically, a bill. Next day in
 8 Dubai, I wake up in the morning. I already have the
 9 bill, and then I go to the bank and wire.
 10 MS. TARASSOVA: Eric, can we take a break
 11 soon?
 12 MR. CHANG: How long a break were you
 13 thinking?
 14 MS. TARASSOVA: Five minutes. It's been
 15 another hour-and-a-half.
 16 MR. CHANG: That's fine. I'm probably
 17 going to wrap up with Mr. Solovyev maybe in
 18 the next 45 minutes; and then real quick with
 19 Ms. -- her last name -- I apologize -- I
 20 forget --
 21 THE INTERPRETER: Ms. Timoshkina.
 22 MR. CHANG: I'll try to remember.
 23 (Brief recess.)
 24 BY MR. CHANG:
 25 Q. Still on the Chaparral and Monterey, other

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1 than by video conference, how did you communicate with
 2 Mr. Solovyev?
 3 A. Different ways: Skype, mail, and telephone.
 4 Q. Is that mail or e-mail?
 5 A. E-mail.
 6 Q. In Dubai, did you go into the Middle East
 7 warehouse on a daily basis?
 8 A. Practically every day.
 9 Q. And you spoke or met with Andrey at Middle
 10 East practically every day; correct?
 11 A. Of course.
 12 Q. With the Chaparral and Monterey, after you
 13 purchased the boats from Copart, did you specifically
 14 instruct Mr. Solovyev to ship the two boats?
 15 A. Yes, I did.
 16 Q. Did you instruct him by Skype, telephone or
 17 e-mail, or a combination?
 18 A. Instructions via Skype; and the bill, e-mail
 19 Q. The bill from Mr. Solovyev to your company?
 20 A. Yes.
 21 Q. Okay. Do you know who the ocean carrier was
 22 for the Chaparral and Monterey?
 23 A. I understood Mr. Solovyev's company, MTL.
 24 Q. Okay. Do you know what kind of company
 25 Marine Transport Logistics is -- MTL?

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1 A. Logistics, shipping. It's a shipping
 2 company, logistics.
 3 Q. Did you ever personally communicate with
 4 anybody at MTL?
 5 A. With Mr. Solovyev only.
 6 Q. Okay. Do you recall paying for ocean
 7 transportation of the Chaparral and Monterey?
 8 A. You mean for these two boats; yes?
 9 Q. Correct. Just the Chaparral and Monterey.
 10 A. I do not remember exactly what amount went
 11 for these two or each separately. I remember that
 12 payments that I made, usually it was like 3,000 US
 13 dollars, or payment in 15,000 -- the wire -- \$15,000.
 14 Or even 50,000 US dollars. Depends on what was the
 15 price and how many boats were purchased.
 16 Q. Do those dollar amounts that you just
 17 described include the purchase price of the boats?
 18 A. Yes. The bill that I would receive from
 19 Solovyev to wire money always included the price of
 20 the boat, delivery, and services for the -- for the
 21 services provided by Solovyev's company and all -- the
 22 shipping itself.
 23 Q. Do you know if there is a bank charge for
 24 wire charges from Dubai to the US?
 25 A. Yes, there is a fee.

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1 Q. How much is the fee for the bank wire
2 transfer?
3 A. The fee in Dubai is in United Arab Emirate
4 money, so they're higher. Once we use the foreign
5 currency calculation, it would cost between 50 and 60
6 US dollars for each wire.
7 Q. That fee is paid by you; correct?
8 A. Bank automatically takes from my account that
9 money. So, of course, I paid.
10 Q. What I mean is, the amount of the transfer
11 fee is not deducted or taken out of the money you
12 send, but it's in addition to the money you send,
13 correct?
14 A. Yes, of course, it was in addition; not from
15 the amount that I wired.
16 Q. Do you know when the Chaparral and Monterey
17 were shipped from New Jersey?
18 A. I do not remember precise date. Well,
19 there's a lot of paper in here -- documents -- so I
20 won't be able to find it quickly.
21 Q. That's fine. Were you in Dubai at Middle
22 East when the Chaparral and Monterey arrived in Dubai?
23 A. Yes.
24 Q. So you knew that they had been shipped and
25 arrived in Dubai; correct?

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1 A. Yes, I knew.
2 Q. Were you at Middle East when the Chaparral
3 and Monterey were being repaired by Middle East?
4 A. Of course I was there, because any repair and
5 all repairs were done from my money. If I wouldn't be
6 there, nothing would be done.
7 Q. Okay. Do you know when the repairs were
8 completed on the Chaparral and Monterey?
9 A. All boats were repaired and ready for sale by
10 March 1st, 2014, because that was -- at that time,
11 there was planned or scheduled some exhibition of
12 boats -- the boat show -- March 4th was supposed to
13 start. So we were getting ready all those boats for
14 the show.
15 Q. That is including the Chaparral and Monterey;
16 correct?
17 A. Yes.
18 Q. Did Middle East successfully present the
19 Chaparral and Monterey at the exhibition?
20 A. No, they were not -- we were not able to sell
21 them. These two were not sold.
22 Q. Was the exhibition an exhibition for sale of
23 the motorboats?
24 A. Yes; it was exhibition for sale -- show and
25 sale.

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1 Q. But Middle East had other boats at the
2 exhibition on March 4th; correct?
3 A. Yes.
4 Q. And the other boats -- not the Chaparral and
5 Monterey -- were those boats at the exhibition?
6 A. Yes. All boats were sold except these two.
7 All boats that we had were presented at that
8 exhibition -- all of those were sold except the two,
9 Monterey and Chaparral.
10 Q. Were you personally present at the
11 exhibition?
12 A. Yes.
13 Q. Okay. What was Middle East's plan to sell
14 these two boats after the exhibition?
15 A. To ship them to United States, so we can use
16 them as rentals or charter; to rent them out in Miami.
17 Q. Were you the person who authorized that
18 decision?
19 A. Yes.
20 Q. Did you personally arrange for the
21 transportation of these two boats from Dubai to the
22 US?
23 A. No, I did not do it in person. That's
24 employee or coworkers, were doing that.
25 Q. Did you give the instructions to arrange the

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1 transportation to the employees or coworkers?
2 A. Of course. And I left, also, money for that
3 procedure. I couldn't take part in the shipping
4 process myself because I was already ready to fly to
5 United States, but I left money for them for that
6 process.
7 Q. Do you remember which Middle East employee
8 you gave those instructions to?
9 A. Yes. Middle East employees, Andrey and Oleg.
10 Q. Okay. Do you know if these two boats were
11 shipped by Middle East back to the US?
12 A. Yes, and I have documents to verify.
13 Q. Do you know how long it takes to ship a boat
14 from Dubai to the US?
15 A. On average, 40 days, plus, minus, but average
16 is 40 days.
17 Q. Do you know how long it takes to go the other
18 way, from US to Dubai?
19 A. I wasn't counting days exactly, but I think
20 an average is the same. Well, I know that there is a
21 little bit longer -- takes longer from Dubai from US
22 than from US to Dubai.
23 Q. Okay. Do you know when the Chaparral and
24 Monterey arrived in the US?
25 A. I called -- I remember I talked -- called

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1 Solovyev -- and it was 4th of July. And Solovyev told
2 me, "Tomorrow the boats should be here."
3 Q. Once the boats arrived in the US, what did
4 you do after you called Solovyev?
5 A. He told me to clear US Customs will cost
6 1,500 US dollars. And the bill -- and he said,
7 "Please provide company requisites or information,"
8 that I should issue invoice to -- to what company I
9 should invoice to.
10 Q. Did you provide that information to
11 Mr. Solovyev?
12 A. Of course. I e-mailed him.
13 Q. What was the company that you wanted him to
14 arrange transportation to?
15 A. Crocus Investments, LLC.
16 Q. In Florida; correct?
17 A. Yes.
18 Q. And did you make the payment of \$1,500 for
19 the customs clearance?
20 A. No, I did not because I hadn't had time. As
21 soon as I e-mailed him requisites, shortly after,
22 Solovyev disappeared. After that, he did not even
23 send me invoice or bill. He stopped answering my
24 phone calls, answering e-mail.
25 Q. When did you e-mail Solovyev to offer to make

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1 the payment of the \$1,500?
2 A. I believe it was also 4th of July 2014, but
3 I'm checking in my files. Okay. In my paper, it says
4 July 16, but that's when I prepared the paper. I need
5 to look in my e-mail box. I am sure that it was in
6 July, but exact date, I will provide later.
7 Q. Could you identify what document you're
8 looking at?
9 A. Just e-mail message.
10 MR. CHANG: Is Mr. Safonov looking at a
11 document or --
12 MS. TARASSOVA: He's looking in his
13 computer. He's trying to find the e-mail.
14 THE WITNESS: Do you really need exact
15 date?
16 MR. CHANG: If he can find it easily now.
17 If it's going to take some time, we'll ask
18 for it later on.
19 THE WITNESS: Okay. Then later.
20 BY MR. CHANG:
21 Q. After you sent the letter to Mr. Solovyev,
22 did you try to reach him by telephone?
23 A. Yes, I sent e-mail. I tried to call. I send
24 e-mails, other calls; but there was no response to any
25 of my e-mails or phone calls.

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1 Q. When you say, "e-mails," do you mean that you
2 sent more than one e-mail afterward?
3 A. Yes; a few e-mails.
4 Q. Does that mean more than five e-mails?
5 A. More than five.
6 Q. More than ten e-mails?
7 A. That, I do not remember.
8 Q. So between --
9 A. I can see that -- on this e-mail address, I
10 already see 13 e-mails. But I remember that I have
11 another e-mail address, and there were some too. So
12 you can say more than ten.
13 I just found in my e-mail box that on
14 July 17, 2014, I e-mailed him requisites of my
15 company. And, here, I can see in this mailbox, he
16 sent me invoice for his services. It was 17 --
17 July 17th, he sent me -- 2014 -- and he replied July,
18 also, 17th.
19 Q. Just to make sure everything is clear, are
20 you saying that on July 17, 2014, you e-mailed
21 Mr. Solovyev about these two boats?
22 MS. TARASSOVA: Eric, I think we're a
23 little bit confused about what you're asking.
24 There are many e-mails. Which timeframe are
25 you asking about?

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1 MR. CHANG: He just mentioned -- sounds
2 like an e-mail, a response, and then a reply
3 all taking place on July 17th. I'm trying to
4 clarify if that's what he meant.
5 MS. TARASSOVA: But are you asking about
6 that timeframe? Because he's confused about
7 what timeframe you're talking about.
8 BY MR. CHANG:
9 Q. On July 17th, 2014, did you e-mail
10 Mr. Solovyev?
11 A. I e-mailed him my company requisites, yes.
12 Q. Did you receive a response from Mr. Solovyev
13 on July 17th?
14 A. No. I have not received a response on my
15 e-mail to him.
16 Q. Did you receive an invoice from Mr. Solovyev
17 at any time in July or August 2014?
18 A. Okay. I received in August, more or less in
19 one month after, for parking.
20 Q. After you received the invoice from
21 Mr. Solovyev, what did you do?
22 A. Initially, once I received his invoice, I
23 replied to that written reply that I do not agree with
24 his invoice numbers.
25 Q. Okay. Do you remember which part of the

15 (Pages 54 - 57)

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1 invoice you disagreed with?
 2 A. All of them. Neither. There was none that I
 3 would agree with.
 4 Q. Did you disagree with the customs clearance
 5 charge?
 6 A. That part wasn't there listed at all.
 7 Q. The customs clearance was not listed in the
 8 August 2014 invoice; is that correct?
 9 A. I do not remember precisely at this moment,
 10 but I think it was not included in that invoice.
 11 Q. Okay. Do you agree that you are responsible
 12 to pay a customs clearance charge?
 13 A. Of course I agree, and that's why I e-mailed
 14 him in July my requisites, which means banking,
 15 address, how to pay and so on. And after I sent him
 16 my requisites and had not received anything from him,
 17 I wrote him a letter that why -- it's not a business
 18 where you're screwing up for him to hide or avoid any
 19 contact and give any explanation.
 20 After I sent a few of those, I received, from
 21 him, invoice -- that one that we are talking about.
 22 And that invoice supposed to be parking, storage or
 23 whatever, of those boats.
 24 Q. Did you agree that you would be responsible
 25 for the uploading of the two boats in the US?

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1 A. Yes; of course it's my responsibility; but as
 2 I already told you, I send him requisites, which means
 3 my banking account, all company -- for the purpose
 4 that he will issue an invoice -- invoice me for the
 5 services. And he received that from me, he
 6 disappeared.
 7 Q. Okay. Did you speak with anyone at Middle
 8 East about these two boats after they arrived in the
 9 US?
 10 A. No, because his friend, Andrey Tretiakov,
 11 also disappeared. They both disappeared -- or all of
 12 them. And that's why I had to then -- I had to fly
 13 back to Dubai and start looking for them.
 14 Q. When did you fly back to Dubai to look for
 15 Andrey?
 16 A. Yes. At the beginning of August -- more or
 17 less August 5th -- approximately August 5th, I flew to
 18 Dubai.
 19 Q. Is that in 2014?
 20 A. Yes.
 21 Q. Were you able to find Andrey or Oleg in
 22 Dubai?
 23 A. Yes, I found; because they did not expect me
 24 to show up there.
 25 Q. When did you find Andrey and Oleg?

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1 A. Two or three days after I arrived to Dubai.
 2 Q. Did you speak to either Andrey or Oleg about
 3 the Chaparral or Monterey?
 4 A. Yes.
 5 Q. What was their response to you?
 6 A. They told me, "You have no reason for worry.
 7 Go back and everything will be fine."
 8 Q. What did you do afterward?
 9 A. We came to office; and what I found, that all
 10 spare parts or repair parts were stolen, missing. The
 11 business car or company car was stolen or missing.
 12 And when I saw that, I filed complaint with police.
 13 Q. Are you saying someone stole the company car
 14 from Middle East?
 15 A. Not somebody. Andrey stole the company car.
 16 Nobody else in Dubai steals.
 17 Q. Then you said you filed a complaint with the
 18 police against Andrey; is that correct?
 19 A. Yes, correct.
 20 Q. Have you been able to recover your car, the
 21 company car?
 22 A. No.
 23 Q. Has anything been done by the police
 24 regarding your complaint?
 25 A. Well, police accepted my complaint and told

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1 us, "We will look into it." Now just wait until we --
 2 at that point, Andrey disappeared completely. And we
 3 returned back to United States because our kid has to
 4 go to school.
 5 Q. I'm going to ask questions now about the
 6 Formula boat. Do you remember when you purchased that
 7 boat?
 8 A. In July 2013.
 9 Q. Was this boat also purchased online at
 10 auction?
 11 A. Yes.
 12 Q. Were you also in a video conference with
 13 Mr. Solovyev and Andrey for this purchase?
 14 A. I do not remember whether we were in video
 15 conference with him and how long, but I can say for
 16 sure that the boat -- this boat -- was also purchased
 17 on auction. That's for sure.
 18 Q. Do you remember telling Mr. Solovyev to send
 19 the Formula to Middle East?
 20 A. Yes.
 21 MS. TARASSOVA: Hey, Eric?
 22 MR. CHANG: Yes.
 23 MS. TARASSOVA: It's getting close to
 24 5:00, and they do need to head back soon
 25 because they have a child that's on her own.

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1 It's a two-and-a-half-hour drive.
 2 So what do you want to do? How do you
 3 want to plan it out? Because I don't know
 4 how much longer you have with Mr. Safonov,
 5 but you still wanted to depose Tatiana. They
 6 could probably go another hour, but that's it
 7 because they have to head back to their
 8 daughter.
 9 MR. CHANG: I'll try to wrap it up. I
 10 don't want to bring them back.
 11 MS. TARASSOVA: And they don't want to
 12 have to come back either. That's why they
 13 would prefer to get as much done today as
 14 they can, but, at the same time, head back
 15 within --
 16 MR. CHANG: If it looks like we're not
 17 even close, we'll work something else out.
 18 I'll try to wrap it up.
 19 MS. TARASSOVA: Thanks.
 20 BY MR. CHANG:
 21 Q. Mr. Safonov, do you remember paying for ocean
 22 freight for the Formula?
 23 A. Yes, from Bank PNC.
 24 Q. Do you remember when that payment was made?
 25 A. I have the bill or statement at home, but I

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1 don't remember precisely. Summer, in July.
 2 Q. You mentioned earlier that it takes
 3 approximately 40 days for a boat to move from the US
 4 to Dubai; correct?
 5 A. No. The big boats, it takes longer than
 6 40 days.
 7 Q. Okay. Do you consider the Formula a big
 8 boat?
 9 A. Yes, because it does not fit into the
 10 container -- shipping container.
 11 Q. So for a big boat like the Formula, do you
 12 know how long it takes to ship from the US to Dubai?
 13 A. I thought it would take at least two months.
 14 Q. So approximately two months afterward -- do
 15 you know if the Formula was ever shipped from the US?
 16 A. No, it was not shipped from United States.
 17 Q. Okay. By November 2013, after more than two
 18 months had passed, did you ask anybody why the Formula
 19 had not been shipped?
 20 A. No, I didn't ask because I knew that -- I was
 21 aware of what had happened.
 22 Q. Okay. By December, 2013, were you concerned
 23 that the Formula had not arrived in Dubai yet?
 24 A. No, I was not concerned that it didn't make
 25 it, because, initially, we were trying to agree on the

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1 shipping cost of that Formula 24 boat. So Solovyev
 2 was trying, supposedly, to find proper shipping
 3 container because it was big. And we know that,
 4 because Formula boat is bigger -- is more than
 5 24 feet. So there is no shipping container as is to
 6 put it in.
 7 That size of boat has to be mounted or
 8 somehow on the deck of the ship -- lower deck.
 9 Solovyev -- in order to have it shipped on the deck of
 10 the ship, it has to be installed on that trailer.
 11 Solovyev was looking or trying to find that size of a
 12 trailer that the boat could fit.
 13 And, also, I asked him to find a car or
 14 truck, actually, that would be capable of towing the
 15 trailer with this boat.
 16 Q. Do you remember when you asked Mr. Solovyev
 17 to find such a trailer?
 18 A. Initially, he offered some trailer that he
 19 found in November, but I didn't like that trailer.
 20 Q. Did you eventually agree on a trailer with
 21 Mr. Solovyev?
 22 A. Yes. In December, he send me pictures of
 23 good or proper trailer that I think is suitable, and I
 24 paid for that trailer.
 25 Q. Did you contact or communicate with

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1 Mr. Solovyev at that time to instruct him to ship the
 2 boat to Middle East?
 3 A. No, I did not continue that; because, at that
 4 time, I noticed that his friend, Andrey Tretiakov,
 5 started to become a crook -- or crooked activities --
 6 stealing, hiding. I noticed that. So at that point,
 7 I decided I don't want to deal with the crooks, so I
 8 instructed him to ship the boat to Miami.
 9 Q. You instructed Mr. Solovyev to ship the boat
 10 to Miami?
 11 A. Yes. I wrote to him -- e-mail.
 12 Q. When was the e-mail sent?
 13 A. At the beginning of February.
 14 Q. Just so I understand, from December 2014 to
 15 February 2015, you did not give any instructions to
 16 ship the Formula to the Middle East. Is that correct?
 17 A. Yes, that's correct, because we agreed and
 18 said that we will deal with it after new year.
 19 Q. Who did you have this agreement with?
 20 A. With Mr. Solovyev.
 21 Q. Okay. After you e-mailed Mr. Solovyev in
 22 February of 2015 to ship the boat to Florida, did you
 23 receive a response from Mr. Solovyev?
 24 THE INTERPRETER: Did you say
 25 February 2015 or 2014?

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1 BY MR. CHANG:
2 Q. I said '15, but I meant '14.
3 A. No, I have not received any response to my
4 e-mail or letter.
5 Q. Did you e-mail or communicate with
6 Mr. Solovyev again after February of 2014 about the
7 Formula?
8 A. I don't remember that, because I was -- at
9 that time, I was planning already to go to United
10 States in May. I had plans -- or we had plans. So
11 then I thought, once I am there, we'll get together,
12 have meeting and resolve the problems.
13 Q. After February 2014, did you speak with
14 Andrey or anybody else at Middle East about the
15 Formula?
16 A. Yes, with Andrey.
17 Q. Do you remember when you had the
18 communication with Andrey?
19 A. I spoke with him almost every day.
20 Q. Do you remember what the substance or the
21 details of your communications with Andrey were
22 regarding the Formula?
23 A. At first, I asked Andrey why Mr. Solovyev
24 does not respond on my request -- letter request -- to
25 ship Formula to Miami. Andrey told me that Solovyev

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1 is going not to respond, or be quiet and ignore your
2 request until we sell two cars that belong to
3 Solovyev, Porsche and Mercedes.
4 Q. Do you remember when you had this discussion
5 with Andrey?
6 A. I believe it was maybe February, because I
7 believe it happened about two weeks after I e-mailed
8 or sent letter -- e-mail letter to Solovyev in
9 February 2014.
10 Q. Is it correct that you did not try to send
11 any additional e-mails or call or Skype Mr. Solovyev
12 until May 2014?
13 A. Maybe I tried -- attempted to contact him
14 over the phone or Skype. I just don't remember
15 exactly.
16 Q. Okay. But if you had sent any e-mails to
17 Mr. Solovyev, would you still have a record of those
18 e-mails?
19 A. Maybe, maybe. I need to check.
20 Q. Did you return to the US in May 2014 as
21 planned?
22 A. Yes. May 28th, I believe.
23 Q. Where in the US were you on May 28, 2014?
24 A. To the address and the place where we live at
25 present.

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1 Q. That's in Florida; correct?
2 A. Yes, Boca Raton.
3 Q. Did you try to reach Mr. Solovyev after
4 returning to Florida in May 2014?
5 A. Yes. We talk on the phone, and he said that
6 we will meet -- when the boats from Dubai will arrive
7 here, then we'll meet.
8 Q. Do you remember when you had that telephone
9 communication with Mr. Solovyev?
10 A. In June.
11 Q. What was your understanding concerning
12 storage charges for the Formula?
13 A. My understanding -- when I saw the invoice
14 for storage and parking, it was clear to me that they
15 are trying to get -- to make the bill so high for the
16 storage that it will be more than boats' value. So --
17 because \$40,000 for storage -- so it's illegal
18 activity. It's a crooked activity. That's why I
19 wrote to him. So he is trying to defraud me.
20 Q. Other than the Formula, were the other
21 boats -- the other motorboats -- that you purchased
22 also big boats?
23 A. Okay. The other two were smaller. The one
24 was 19 feet; the other one, 21 feet; and Formula was
25 34.

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1 Q. For the other boats, not including the
2 Chaparral, Monterey or Formula, were there any other
3 boats that were considered big boats?
4 A. Yes. We had a big one.
5 Q. Which boat was that?
6 A. Sea Ray 300.
7 Q. Did the Sea Ray also require a trailer to
8 ship?
9 A. Yes.
10 Q. And did you have any problems getting the
11 Sea Ray shipped from the US to Dubai?
12 A. Not any special problems. One thing, though.
13 The trailer, when it came, was broken.
14 Q. Other than the Formula, for all the other
15 boats that you purchased from the US, were they
16 shipped within a month of the purchase?
17 A. It depends. Some were -- that was controlled
18 by Solovyev -- this process. And depends on the boat
19 size. It was his part of the job that he would try to
20 fit two boats in one shipping container, or what the
21 best fit is, and then ship. So it varied, I would
22 say.
23 Q. Do you remember any boats that took more than
24 two months from purchase before shipping?
25 A. No, I don't.

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1 Q. With the Formula, was your objection to the
2 storage fee on the amount of the storage or to any
3 storage?
4 A. The answer is that the bill for \$40,000,
5 which if we consider it's for storage, is tenfold or
6 ten times exceeds normal price for that. But that
7 invoice he issued and sent to me after I sent him a
8 letter that he should not get involved in criminal
9 activities or a fraud that Andrey is committing.
10 Q. Do you agree that for a boat that remained in
11 storage for more than a month, you're responsible for
12 the storage of that boat?
13 A. As a matter of principle, at the same time,
14 my company had his two cars that were stored or parked
15 there -- were repaired and stored until he will claim
16 them, and he never received any bill or invoice for
17 storage of his two cars and repairs.
18 So for him, it's a pure insolence or
19 impudence to issue the invoice, especially in such an
20 amount.
21 Q. Do you know how long those two cars were
22 stored at Middle East?
23 A. Okay. We cleared the customs -- or cleared
24 those two cars through Dubai customs in 2013,
25 September.

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1 Q. Were those two cars eventually sold by Middle
2 East?
3 A. As I already said, Andrey sold Mercedes
4 without my knowledge and sent or wired money to
5 Solovyev.
6 Q. Do you remember when that sale took place?
7 A. It arrived in September; October 20 for
8 repairs. So I would say November or December 2013.
9 Q. Okay. Do you know if Middle East sold the
10 Porsche Panamera?
11 A. I don't know, because he and Solovyev stole
12 it; and whatever they did with it, I don't know.
13 Q. You do not remember or you don't know when
14 the Porsche left Middle East?
15 A. I know one thing -- that when I talked to
16 employees of shipping company in Dubai that I used --
17 I know them -- as in part of investigation, they told
18 me that the Porsche was shipped to Russia in August of
19 2014. So when we arrived, they shipped it right away.
20 Q. Who did you speak with that told you the
21 Porsche was shipped in August 2014?
22 A. I don't remember the name. It's something
23 cargo. It's a shipping company. That company -- that
24 shipping company, we used to deliver the boats from
25 Dubai to Sharjah. So the company worked in Dubai --

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1 shipping.
2 Q. For the Porsche and the Mercedes, did you
3 have an agreement with Mr. Solovyev that you would not
4 charge him storage?
5 A. No. Everything was based on trust, and he
6 would send whatever he wants to our company.
7 Q. Other than these two cars, the Mercedes and
8 the Porsche, did Mr. Solovyev send any other
9 machineries to your company?
10 A. No. He asked to sell these two -- those two
11 cars -- and also requested to send money to him.
12 Q. Do you know how much storage is charged by
13 Middle East for a car?
14 A. I don't remember now.
15 Q. Can you estimate, to the best of your
16 recollection, how much the storage charge was at
17 Middle East?
18 A. After I received invoice or bill from
19 Solovyev, I sent him initial invoice, too, for these
20 two cars. My invoice included repair, customs
21 clearance in Dubai, and parking, and all other
22 services that were provided to those two cars, and it
23 was 50,000.
24 Q. Did Middle East store cars or boats for any
25 other customers?

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1 A. No.
2 Q. Middle East is not in the business of
3 providing warehouse space; is that correct?
4 A. No. That was just help or a friendly favor
5 to Solovyev. The reason for that was because damaged
6 cars, he will not be able to sell in United States.
7 That's why he wanted us to help him ship the cars to
8 my company in Dubai, fix them, and then only sell.
9 Q. Did Middle East receive any money from the
10 sale of the cars?
11 A. No.
12 Q. Did Middle East receive any money from the
13 repair of the cars?
14 A. No. I paid for that repair.
15 Q. Have you been able to recover the money that
16 you loaned to Oleg under the promissory note?
17 A. Less than 50 percent. Because when we sold
18 boats, those boats that we sold, part of that money I
19 received, but it's less than he owes me -- less than
20 50 percent what he owes me.
21 Q. I apologize. Were you able to recover the
22 money directly from Oleg that you loaned him?
23 A. I have not received anything directly from
24 Oleg.
25 Q. Are there currently any lawsuits against

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1 Middle East Asia in Dubai?
 2 A. There's no lawsuits against the Middle East
 3 company.
 4 Q. Do you know of any lawsuits against you
 5 personally in Dubai?
 6 A. No.
 7 Q. Do you know of any lawsuits against Andrey in
 8 Dubai?
 9 A. Oh, Sergey and I.
 10 Q. Sergey and you? I'm sorry. What do you mean
 11 by Sergey and you?
 12 A. It means, I know one more person who filed
 13 the lawsuit in Dubai against Andrey.
 14 Q. So there are two lawsuits against Andrey?
 15 A. Yes; I and the other man, but two cases.
 16 Q. Do you know of any lawsuits against Oleg in
 17 Dubai?
 18 A. Yes; against Oleg too.
 19 Q. Is that also a lawsuit filed by you and
 20 Sergey?
 21 A. And there is a third person, yes. I, Sergey
 22 and the third, also. I know another -- third person
 23 that also filed against.
 24 Q. What is the basis for your lawsuit against
 25 Andrey?

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1 A. For fraud, and, also, stealing the company's
 2 assets.
 3 Q. Has Andrey responded to your lawsuit in
 4 Dubai?
 5 A. Yeah. He run away to Russia.
 6 Q. So no response has been entered by Andrey in
 7 the Dubai lawsuit; correct?
 8 A. Of course not, because he doesn't want to be
 9 in jail there, so he prefer to run away.
 10 MR. CHANG: Louiza, I'm going to end
 11 there for Mr. Safonov and try to wrap up
 12 quickly for Ms. Timoshkina. No further
 13 questions.
 14 MS. TARASSOVA: Give me one second.
 15 (The reading and signing of the
 16 transcript were not waived, and these
 17 proceedings concluded at 5:45 p.m.)
 18
 19
 20
 21
 22
 23
 24
 25

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1 CERTIFICATE OF OATH
 2
 3 STATE OF FLORIDA
 4 COUNTY OF ORANGE
 5
 6
 7 I, Lisa Gerlach, the undersigned Notary
 8 Public, in and for the State of Florida, hereby
 9 certify that Alexander Safonov personally appeared
 10 before me and was duly sworn.
 11
 12 WITNESS my hand and official seal this
 13 21st day of December, 2015.
 14

 15
 16 Lisa Gerlach, Court Reporter
 Commission #DD353538
 Expires 9/8/2016
 17
 18
 19
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 21
 22
 23
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 25

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1 CERTIFICATE OF REPORTER
 2 STATE OF FLORIDA
 3 COUNTY OF ORANGE
 4
 5 I, Lisa Gerlach, Court Reporter, do hereby
 6 certify that I was authorized to and did
 7 stenographically report the foregoing deposition; and
 8 that the transcript is a true and correct
 9 transcription of the testimony given by the witness.
 10 I further certify that I am not a relative,
 11 employee, attorney or counsel of any of the parties,
 12 nor am I a relative or employee of any of the parties'
 13 attorney or counsel connected with the action, nor am
 14 I financially interested in the action.
 15 Dated this 21st day of December, 2015.
 16

 17 Lisa Gerlach, Court Reporter
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 20 The foregoing certification of this transcript does
 21 not apply to any reproduction of the same by any means
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1 ERRATA SHEET
 2 RE: Crocus v. Marine Transport Logistics, et al.
 DEPO OF: Alexander Safonov
 3 TAKEN: December 3, 2015
 4
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 Under penalties of perjury, I declare that I have read
 17 the foregoing document and that the facts stated in it
 are true.
 18
 19 _____
 DATE ALEXANDER SAFONOV
 20
 21 Subscribed and sworn before me this ____ day of
 _____, 20____.
 22
 State of Florida)
 23 County of) _____
 NOTARY PUBLIC
 24
 25

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 23 County of) _____
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 24
 25

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